

**Government of the District of Columbia**  
**Department of Transportation**



**d.** Office of the Director

September 24, 2018

Honorable Mary M. Cheh  
Councilmember, Ward 3  
Council of the District of Columbia  
John A. Wilson Building, Suite 108  
1350 Pennsylvania Avenue NW  
Washington, DC 20004-3003

Re: BZA Case Parking Exception for Memory Care Facility

Dear Councilmember Cheh:

Thank you for your September 17, 2018 letter outlining your concerns with the MED Developers, LLC proposal to build a 34-unit memory care facility at 2619-2623 Wisconsin Avenue NW. Developers who are seeking relief from zoning requirements for their projects are referred to the District Department of Transportation (DDOT) for agency comment.

The development review team within the Planning and Sustainability Division (PSD) of DDOT, evaluates the impact of a developer's project actions on the District's multimodal transportation network. The review team gathers input from all stakeholders within the agency to assess any proposed projects. DDOT does not have approval authority of the zoning action it reviews. Instead, we manage the agency review process for relevant activities so that informed, well-reasoned recommendations, including the identification of impacts and potential mitigations, are made to the appropriate zoning, permitting, or reviewing bodies.

Per the District of Columbia Municipal Regulations, Zoning Regulations Chapter 11, Subtitle C § 700.3, the Zoning Administrator may, at his or her discretion, request that the District Department of Transportation review and make a recommendation regarding any item on the vehicle parking plan prior to approving the building permit application. In addition, § 703.2 states the Board of Zoning Adjustment may grant a full or partial reduction in number of required parking spaces, subject to the general special exception requirements of Subtitle X, and the applicant's demonstration of at least one (1) of the following: ... (c) Land use or transportation characteristics of the neighborhood minimize the need for required parking spaces; and § 703.4 states any request for a reduction in the minimum required parking shall include a transportation demand management plan approved by the District Department of

Board of Zoning Adjustment  
District of Columbia

Councilmember Cheh,  
Re: BZA Case Parking Exception for Memory Care Facility  
Page 2

transportation, the implementation of which shall be a condition of the Board of Zoning Adjustment's approval.

Accordingly, our September 14, 2018 report provides a recommendation to the Board of Zoning Adjustment (BZA) to consider our findings, balance them with those of other stakeholders, such as the Office of Planning, the Advisory Neighborhood Commission (ANC), and the community to make a legal decision. DDOT's interest in this project lies in its impacts to the transportation network, namely on-street parking, traffic operations, and usage of the public alley. As such, our review of the application reflected these areas of concern. This approach is consistent with the criteria for special exceptions from parking minimums, per Subtitle C §703.2. However, DDOT defers to the Zoning Administrator or the BZA to make an official determination on that matter. We also defer to the Office of Planning regarding concerns of the proposal's "compatibility" with the surrounding neighborhood, as well as any other non-transportation criteria outside of DDOT's purview. Based on our review, we concluded that:

- Due to the low amount of provided on-site vehicle parking spaces, as well as the property regulation that would prohibit residents from having vehicles on-site, the proposed 34-unit development located at 2619-2623 Wisconsin Avenue NW would not generate significant amounts of traffic at this location;
- The reduction from the required seventeen (17) parking spaces to the nine (9) proposed parking spaces on-site, in conjunction with the availability of on-street vehicle parking, off-street parking garages, staggered employee work schedules, and the developer's commitment to encouraging non-automotive travel for the employees, is adequate for this development; and
- The adjacent existing rear 15-foot public alley will serve the site's loading and vehicle parking access.

Based on those conclusions, our report to the BZA did not raise objection to the special exception use and relief from eight (8) parking spaces being sought by the developer. In reviewing the proposed request, DDOT used a methodology consistent with our evaluation of other applications for zoning relief. Our report does not preclude any other stakeholders from submitting comments or testimony to the BZA as part of the decision-making process.

We hope this additional information has clarified DDOT's position on the MED Developers, LLC proposal to build a 34-unit memory care facility at 2619-2623 Wisconsin Avenue NW. Thank you again for contacting DDOT and providing feedback on our September 14, 2018 report. Please do not hesitate to reach out to me or Anna Chamberlin, Neighborhood Planning Branch Manager at [anna.chamberlin@dc.gov](mailto:anna.chamberlin@dc.gov) or 202.671.2218 if you require further clarification.

Sincerely,



*for* Jeff Marootian  
Director

cc: Anna Chamberlin, Neighborhood Planning Branch Manager | DDOT