

Government of the District of Columbia

Department of Transportation



d. Office of the Director

December 18, 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 19823 – Wisconsin Avenue Baptist Church at 3920 Alton Place NW

Dear Councilmember Cheh:

Thank you for your November 7, 2018 letter outlining some of the community's concerns with the Sunrise proposal to redevelop the Wisconsin Avenue Baptist Church site with a 250-seat church and 85-unit continuing care retirement facility. Applicants seeking relief from zoning requirements 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.

To summarize the findings of our October 10, 2018 report, we concluded:

- Redevelopment of the site would generate fewer vehicle trips in the weekday morning and evening commuter peak hours and during the busiest Sunday peak hour than the existing church and daycare facility;
- The site appears to meet all 2016 Zoning Regulations (ZR16) for vehicle parking, bicycle parking, and loading requirements, but the Zoning Administrator makes the official determination on ZR16 compliance;
- Several intersection modifications to improve pedestrian safety, as identified by the community during the BZA review process, should be coordinated with DDOT; and
- DDOT has no objection to the approval of the requested relief so long as conditions are included in the Order requiring the Applicant to implement both a Transportation Demand Management (TDM) Plan and Loading Management Plan (LMP), as identified in our report.

Regarding the comments in your November 7, 2018 letter to DDOT, we offer the following responses:

How much traffic would be generated by a 24/7 facility housing 121 individuals with a 75-person staff plus a 250-seat church? The applicant has stated that there will also be 20 trucks coming to the site every week and there will, undoubtedly, be the need for ambulances. How many visitors does the agency estimate will visit the 121 residents? Do these counts include guest to events are Sunrise, such as the concerts that are organized at other Sunrise facilities?

According to the trip generation estimates the Applicant developed in close coordination with DDOT during the Comprehensive Transportation Review (CTR) process (see table below from the 10/8/18 CTR), the proposed redevelopment would generate fewer weekday peak hour trips than the current site. This is primarily due to the changing of the daycare use to a less intense assisted living use. The trip generation assumptions for the assisted living facility were based on observed traffic volumes generated by two (2) comparable sites in Chevy Chase, MD, and Alexandria, VA. Additionally, the church is being reduced in size from 350 seats to 250 seats and will continue not to generate many trips outside of the Sunday peak hour.

Mode	Land Use	AM Peak Hour			PM Peak Hour			Sunday Peak Hour		
		In	Out	Total	In	Out	Total	In	Out	Total
Existing (veh/hr)	Church (350 seats)	1	1	2	3	4	7	47	48	95
	Daycare (56 students)	16	14	30	14	15	29	2	2	4
Proposed (veh/hr)	Church (250 seats)	1	1	2	2	2	4	34	34	68
	Assisted Living (85 units)	10	6	16	5	10	15	11	6	16
	Net Vehicular Trips	-6	-8	-14	-10	-7	-17	-4	-10	-15

The estimates noted above only include all types of trips and visitors traveling to the site during the busiest commuter hours on weekdays and the busiest church hour on Sundays. The estimates do not take into account special events that occur during off-peak times.

The CCRC special exception being sought requires that six conditions be met, including sufficient parking to accommodate parking for all residents, staff, and visitors, which should be an analysis independent of whether they meet the residential parking required by 11-C DCMR § 701.5. That means off-street parking in the garage. The developer is providing 66 spaces. In its traffic report, however (Traffic Report, Exhibit 53A at p. 13), the applicant notes that it will "provide information on alternative parking locations for Church attendees and Sunrise visitors on its website, instructing drivers to park in on-street meters and/or nearby parking garages and not residential spaces. This information will be sent to attendees of any events held on site." This concession would appear to suggest that more parking is required for residents, staff, and visitors that will be provided on site. How can the agency conclude that the parking being proposed actually accommodates all the needs of the facility?

The Applicant is meeting their ZR16 requirement for on-site vehicle parking and is not seeking parking relief. Given the site proximity to a Metro station, a major bus transfer point, along with their proposed TDM plan, DDOT has no concerns with the parking proposal.

The applicant states that it will make every effort to direct their traffic to use only Alton Place and Yuma Street. The agency's report, however, largely concentrates on 39th Street. There does not appear to be adequate consideration of traffic on Alton and Yuma.

The Applicant's study focused on 39th Street, Alton Place and Yuma Street, which are all low volume streets. Since this project is only expected to generate 18 vehicle trips in the weekday AM commuter peak hour, 19 vehicle trips in the PM commuter peak hour, and 84 vehicle trips during the busiest hour on Sunday, further evaluation of the transportation network was not requested by DDOT.

The DDOT Report expresses concern about turn rotations for the 7-ton shuttle maneuvering on Alton Place, a 30-foot wide street with two-way traffic and parking on both sides, in other words, 7 feet on each side devoted to parking and 8 feet wide lanes in both directions. The report (exhibit 52A at p.11) makes no mention of the 30-foot box trucks that would be using Alton and making a right turn on to the truck ramp. Nor does the report consider the trucks are leaving the truck ramp and turning on to Yuma Street, which is only 34 feet wide and is a two-way street with parking on both sides. Why was this not part of the analysis?

Thirty-foot trucks are very common in the District and usually are able to turn into driveways and alleys without any problems. The Applicant has designed their site in such a way that all turning movements to and from the private driveway will occur without backing through public space, consistent with DDOT policy. It is also noted that the Applicant voluntarily proposed to implement a Loading Management Plan (LMP), which DDOT supports, to further facilitate ingress and egress of trucks serving the property. If at any point in the future the locations of street signs need to be adjusted along Alton Place or Yuma Street due to truck turns, DDOT is available to work with the community and Applicant on those or any other accommodations.

Sunrise is providing a "lift" that is being cited to fulfill the requirement for a loading platform, which "shall consist of one horizontal level" and be 100 SF including it must be 8 feet wide. Does the lift meet these requirements? 11-C DCMR § 905.4(a).

DDOT defers to the ZA and the Department of Consumer and Regulatory Affairs (DCRA) for an official zoning determination on that matter. Since ZR16 took effect, DDOT has seen a number of proposed loading dock designs that have required further interpretation from the ZA. DDOT's main concern is ensuring that all loading activities take place on private property and not in conflict with other modes of travel. This proposal provides for all loading on private property.

The "service delivery space," which is located inside the garage parallel to space for the shuttle, is required to be "accessible at all times" and be "usable and accessible by the vehicles that it is intended to serve." 11-C DCMR §904.1 and 11-C DCMR §904.5. How do the trucks use this "service delivery space" inside the garage and next to the 7-ton shuttle? Does the service delivery space have a clearance of ten feet as required by 11-C DCMR§905.3?

DDOT does not have an objection to the design of the delivery space since there is adequate space on site, either within the designated loading areas or using the private drive aisle to perform all pick-up and drop-off activities without queuing into the public streets. The Applicant can provide further rationale for how they intend for this delivery space to be used. Additionally, the ZA and DCRA can give an official determination on whether the delivery space meets the ZR16 design and accessibility requirements.

RE: BZA 19823 – Wisconsin Avenue Baptist Church at 3920 Alton Place NW
Honorable Mary M. Cheh
Page 4

What is the height of the garage entrance opening? What trucks can enter, with particular concern regarding the 30-foot box trucks, 28-ton trucks, garbage trucks, and shuttle?

DDOT notes that the design of the building is outside of our purview since it is located on private property. It does not appear that the design of the garage entrance will cause any issues with vehicles queuing into the nearby public streets. However, the Applicant can provide further clarification on this matter.

The driveway cannot have a slope steeper than 12% (a 12-foot drop over 100 feet). The truck ramp drop is more than 13 feet based on the height of the retaining wall, which is being measured starting at the first-floor level at several feet below grade. Will Sunrise also have an open roll-off container in this area, as they do at other Sunrise facilities, which will occupy substantial space? And, taken together, is there, in fact, sufficient room for a driveway no steeper than 12% slope?

Since the private driveway is located on private property, this is outside of DDOT's purview. The Applicant should provide further clarification on the driveway design. Additionally, the ZA and DCRA can provide an official determination on whether it meets ZR16 design requirements for a driveway or drive aisle.

We hope this additional information has clarified DDOT's position on the Wisconsin Avenue Baptist Church redevelopment proposal and satisfactorily answered all of the questions posed in your November 7, 2018 letter. Thank you again for contacting DDOT. For further questions regarding this matter, please contact Anna Chamberlin, Neighborhood Planning Branch Manager at 202.671.2218 or via email at anna.chamberlin@dc.gov.

Sincerely,



Jeff Marootian
Director

Cc: Anna Chamberlin, Neighborhood Planning Branch Manager, DDOT