

Government of the District of Columbia


Department of Transportation



d. Planning and Sustainability Division

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment

FROM: Anna Chamberlin, AICP
Associate Director 

DATE: May 28, 2021

SUBJECT: BZA Case No. 20443 – 1051-1059 29th Street NW (West Heating Plant)

APPLICATION

Georgetown 29K Acquisitions, LLC, (the “Applicant”), pursuant to Title 11 (2016 Zoning Regulations) of the District of Columbia Municipal Regulations (DCMR), Subtitle C § 909.2, Subtitle C § 1504.1, and Subtitle X § 902.1, requests relief from the loading berth requirement of Subtitle C § 901.1 and penthouse requirements of Subtitle C § 1500.6 and 1502.1 to convert an existing, detached, non-residential building to a 10-story 70-72 unit residential building with 95-105 vehicle parking spaces. The Applicant is also seeking relief from the carshare and street tree TDM mitigations required by Subtitle C § 707.3(a) for providing excessive vehicle parking. The site is located in the MU-13 Zone at 1051-1055 29th Street NW (Square 1193, Lots 45, 46, & 800-804).

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 a 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 multi-modal 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:

Vehicle Parking and TDM Mitigation Relief

- The Applicant is exceeding the required 12 vehicle parking spaces (with 50% allowable reduction) and proposing 95-105 parking spaces in an on-site garage accessed via 29th Street;
- This amount of off-street parking is considered excessive under Subtitle C § 707.3(a) and triggers specified TDM mitigations for additional bike parking, street trees, car share spaces, and electric vehicle charging stations;
- The proposed parking supply also exceeds the amount that DDOT would expect for a site within ½ mile of a Metrorail Station (Foggy Bottom). Presence of extra parking has the potential to induce additional vehicle trips on the roadway network;
- The Applicant has indicated that they cannot provide public access to their parking garage for the car-share spaces, as required by 707.3(a)(4);
- The Applicant and DDOT discussed moving the carshare spaces out of the garage and to a curbside location on 29th Street NW; however, DDOT has a policy of only reserving curbside space for carsharing vehicles if requested by a ready and willing carshare provider (i.e., ZipCar);
- Regarding the additional street trees, the Applicant is able to provide these; however, Urban Forestry Division has indicated they do not have any available planting locations in Ward 2;
- The Applicant is proposing to exceed the 24 long-term and four (4) short-term bicycle parking requirements by providing 48 long-term and eight (8) short-term spaces (4 inverted U-racks) as required to mitigate the excessive vehicle parking. These are not shown on the zoning tabulation page of the planset, but are included in the TDM Plan;
- In lieu of the required additional carshare spaces and street trees, and to address potential induced traffic generated by the over-parking condition, the Applicant has agreed to a robust TDM Plan in the April 28, 2021 Gorove/Slade Technical Memo (Exhibit 35A); and
- DDOT finds this TDM Plan acceptable with one revision: the Applicant will meet the requirements of Subtitle C, § 707.3(a)(3) for two (2) electric vehicle charging stations, as calculated by DCRA, in-lieu of the \$25,000 contribution to the Transportation Mitigation Fund. The TDM plan in the Recommendation section below reflects this change.

Loading Relief

- The Applicant is requesting loading relief from the zoning-required (1) 30-ft loading berth and one (1) 20-ft delivery space due to the existing historic wall and proposed horizontal metal beam supporting the building façade which will result in a vertical clearance height too low for trucks;
- The Applicant is proposing trash collection to occur curbside on 29th Street NW adjacent to a loading area behind the historic wall toward the southern end of the site;
- DDOT will work with the Applicant during permitting on the appropriate signage and curb side restrictions, including the possibility of a “no parking” loading zone, near the trash door;
- Residential move-ins and move-outs can be accommodated by obtaining “emergency no parking” signs from DDOT. These signs allow residents to reserve an on-street parking space for their moving truck;
- There is an existing 53-foot long “commercial loading zone” on the west side of 29th Street NW directly across from the site. Trucks to the site may use it so long as they meet District regulations for size of truck (22 foot minimum), paying the meter, displaying ticket, time of use (under 2 hours), and first come-first serve; and

- The Applicant has proposed a Loading Management Plan (LMP) in the April 28, 2021 Gorove/Slade Technical Memo (Exhibit 35A), which DDOT finds acceptable.

RECOMMENDATION

The District Department of Transportation (DDOT) has reviewed the application materials and has no objection to the approval of the requested TDM mitigation relief and loading relief with the following conditions:

- The Applicant will implement the following Transportation Demand Management (TDM) Plan, for the life of the project, unless otherwise noted:
 - Identify Transportation Coordinators for the planning, construction, and operations phases of development. The Transportation Coordinators will act as points of contact with DDOT, goDCgo, and Zoning Enforcement;
 - Will provide Transportation Coordinators' contact information to goDCgo, conduct an annual commuter survey of employees on-site, and report TDM activities and data collection efforts to goDCgo once per year;
 - Transportation Coordinators will develop, distribute, and market various transportation alternatives and options to the residents, including promoting transportation events (i.e., Bike to Work Day, National Walking Day, Car Free Day) on property website and in any internal building newsletters or communications;
 - Transportation Coordinators will receive TDM training from goDCgo to learn about the TDM conditions for this project and available options for implementing the TDM Plan;
 - Provide welcome packets to all new residents that should, at a minimum, include the Metrorail pocket guide, brochures of local bus lines (Circulator and Metrobus), Guaranteed Ride Home (GRH) brochure, and the most recent DC Bike Map. Brochures can be ordered from DDOT's goDCgo program by emailing info@godcgo.com;
 - Provide residents 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 (MWCOC) or other comparable service if MWCOC does not offer this in the future;
 - Transportation Coordinator will subscribe to goDCgo's residential newsletter. Development team will post all TDM commitments on the project website which is publicly available;
 - Offer a free SmarTrip card to every new resident and a complimentary Capital Bikeshare coupon good for one ride;
 - Will exceed ZR16 short- and long-term bicycle parking requirements. Long-term bicycle space will be provided free of charge to residents. The project will provide 48 long-term bike parking spaces and 8 short term bike parking spaces;
 - Developer will work with property manager to share transit information, if feasible, via the property's resident smartphone application;
 - Provide a bicycle repair station in each long-term bicycle parking storage room;

- Provide one (1) collapsible shopping cart (utility cart) for every 50 residential units, for a total of two (2) for the 72-unit project, to encourage residents to walk to the grocery shopping and run errands;
 - Current design includes a conference room with internet connectivity for exclusive resident use for business meetings and other work-from-home related activities;
 - Offer an annual membership to Bikeshare to each employee for 2 year(s) after the building opens;
 - Offer SmarTrip cards pre-loaded with \$75 for all new residents for two year(s) after the building opens;
 - Fund and install a total of two (2) expansion plates at nearby Capital Bikeshare (CaBi) stations in locations to be determined by DDOT,;
 - Property will provide up to \$500 per year for two years to either ANC 2-E or the Georgetown Business Improvement District to subsidize public events related to walking tours, local transportation meetings, public art, bicycling seminars, multi-modal transportation events, and any other transit related public events in the neighborhood;
 - The GAR required for the project by Subtitle C, Chapter 6 will be increased by 0.018. The Applicant will ensure the project's GAR meets this increase in GAR; and
 - The project will meet the requirements of Subtitle C, § 707.3(a)(3) for two (2) electric vehicle charging stations.
- The Applicant will implement the following Loading Management Plan (LMP), for the life of the project:
 - The property management company will designate a staff member to serve as an on-site loading manager during delivery hours. The property manager or loading manager will be responsible for coordinating with residents to schedule deliveries and will work with the community and neighbors to resolve any conflicts should they arise;
 - A purchase agreement provision will require all residents to coordinate certain deliveries and move-in and move-out activities with the property manager;
 - All residents will be required to schedule deliveries that utilize any loading zone along 29th Street for any loading operation conducted using a truck 18 feet in length or larger;
 - Service vehicle/truck traffic interfacing with 29th Street NW will be monitored during peak periods and management measures will be taken, if necessary, to reduce conflicts between truck and vehicular movements;
 - Residential trash pickup will occur at the trash/loading area on 29th Street NW accessible from a loading or "no parking" zone, subject to DDOT approval. Property management personnel will bring the trash receptacles out to the trash vehicle and return them to the trash room after the trash has been picked up;
 - The loading manager will schedule deliveries using any loading zone along 29th Street such that the loading zones' capacities are not exceeded. In the event that an unscheduled delivery vehicle arrives while any of these areas are full, that driver will be directed to return at a later time so as to not compromise safety or impede street functionality;
 - Trucks using any of the loading zones 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 loading manager will be responsible for disseminating suggested truck routing maps to the building's residents and to drivers from delivery services that frequently utilize the loading zone, as well as notifying all drivers of any access or egress restrictions. The loading zone 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.

CONTINUED COORDINATION

- Coordinate with DDOT's Parking and Ground Transportation Division (PGTD) during permitting to install appropriate signage and curbside restrictions along 29th Street NW to serve the trash collection. If multi-space meters are required, they will be at the expense of the Applicant;
- Coordinate with the Ward 2 Arborist regarding the preservation of any Heritage, Special, and Street trees on-site or to obtain tree removal permits, if eligible. This may include the exploration and marking of utilities in trees boxes to find the exact depth of utilities;
- Continue to coordinate with DDOT regarding the air-rights agreement of the Whitehurst Freeway at the southern end of the property. This will need resolved before moving forward further with design; and
- Any proposed public space improvements, including curb and gutter, street trees and landscaping, streetlights, sidewalks, curb cuts, and other features within the public rights of way, are expected to be designed and built to DDOT standards. The Applicant is encouraged to participate in a Preliminary Design Review Meeting (PDRM) with DDOT and the Office of Planning (OP) to discuss the public space comments in this report.

TRANSPORTATION ANALYSIS

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.

Subtitle C § 701.5 and § 702.1 of the Zoning Regulations requires a minimum of 12 vehicle parking spaces with the allowable 50% reduction for being within ½ mile of the Foggy Bottom Metrorail Station. Subtitle C § 707.3(a) has set a maximum parking supply of approximately 69 spaces for this site, as estimated by DDOT, which is two (2) times the minimum requirement (excluding the 50% transit reduction). The Applicant is proposing to significantly exceed this amount by providing 95-105 spaces in a parking garage which triggers ZR16-specified TDM mitigation measures. This parking supply also significantly exceeds the amount of parking DDOT would expect to see for a 72-unit residential development located within ½ mile of a Metrorail station (approximately 30 spaces), per the preferred maximum parking ratios in the *Guidance for Comprehensive Transportation Review (CTR)*. The presence of extra parking has the potential to induce demand for additional driving on the transportation

network. As such, the Applicant has committed to a robust Transportation Demand Management (TDM) plan in the April 28, 2021 Gorove/Slade Technical Memo (Exhibit 35A) which is outlined in the Recommendation section and incorporates minor revisions agreed to by both DDOT and the Applicant.

The Applicant is seeking relief from the TDM mitigation requirements outlined in Subtitle C § 707.3(a)(2) and § 707.3(a)(4), which include installation car share spaces and street trees. The Applicant is able to meet the electric vehicle charging station mitigations of two (2) vehicle spaces and additional bike parking requirements. They will provide 48 long-term and eight (8) short-term bicycle parking spaces. These were not shown on the zoning tabulation page of the plan set but were noted in the Transportation Statement and following Technical Memo (Exhibit 35A).

The Applicant has indicated that they cannot provide public access to car-share spaces in their garage due to the secure entrance. DDOT and the Applicant discussed the possibility of moving this item to public space along the east side of 29th Street NW. However, DDOT does not designate on-street parking spaces for car-share use unless proposed by a ready and willing car-share provider (i.e., ZipCar, Enterprise). Regarding the street tree mitigation, the Applicant is able to meet this requirement; however, Urban Forestry Division (UFD) determined that there were not any available locations for street tree installation in Ward 2. In lieu of the car-share spaces and street tree mitigations, DDOT requested and the Applicant agreed to included additional strategies in the TDM Plan. Prior to issuance of the zoning order, the Applicant shall update the TDM plan to reflect the agreed to mitigations.

Bicycle Parking

Subtitle C § 802.1 of the Zoning Regulations require 24 long-term and four (4) short-term bicycle parking spaces. The Applicant is proposing to exceed these requirements by providing 48 long-term and eight (8) short-term spaces (4 inverted U-racks) as required to mitigate the excessive vehicle parking. The short-term spaces should be located in public space near building entrances. Long-term spaces are proposed in the parking garage. It is noted that the Applicant's latest plan set does not show the increased amount of bike parking in zoning tabulation table; however, these quantities are stated in the April 28, 2021 Gorove/Slade Technical Memo.

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 mode areas 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. Access to this building for loading and unloading, delivery and trash pick-up is an important consideration, and DDOT expects the Applicant to comply with DDOT's standards for loading.

Subtitle C § 902.1 of the Zoning Regulations require one (1) 30-ft loading berth and one (1) 20-ft delivery space. The Applicant is requesting relief from both the loading berth and delivery space as there is an existing historic flood wall and horizontal metal beam supporting the building's historic façade. Any opening in this wall that would keep the historic structure and beam intact would not be large enough to accommodate the 14-ft vertical clearance for delivery vehicles and trucks. The Applicant has committed to a Loading Management Plan (LMP) in the April 28, 2021 Gorove/Slade Technical Memo, which DDOT supports. The LMP is outlined in the Recommendation section above and incorporate several minor revisions agreed to by both DDOT and the Applicant.

The Applicant is proposing an on-street “no parking” loading zone on the east side of 29th Street just long enough to allow for a trash truck to access the loading area behind the historic wall (see Figure 1 below). DDOT will work with the Applicant during permitting to determine the appropriate signage and curb side restrictions along their frontage. There is a commercial loading zone on the west side of 29th Street directly across from the site. The Applicant can direct deliveries and trash to use that zone so long as they meet all regulations for size of vehicle (22 feet or longer), pay the meter, display the ticket, stay for no longer than two (2) hours, and use it on a first come-first serve basis. Residents of the building may apply to DDOT for “emergency no parking” signs which can be used to reserve an on-street parking space for moving.

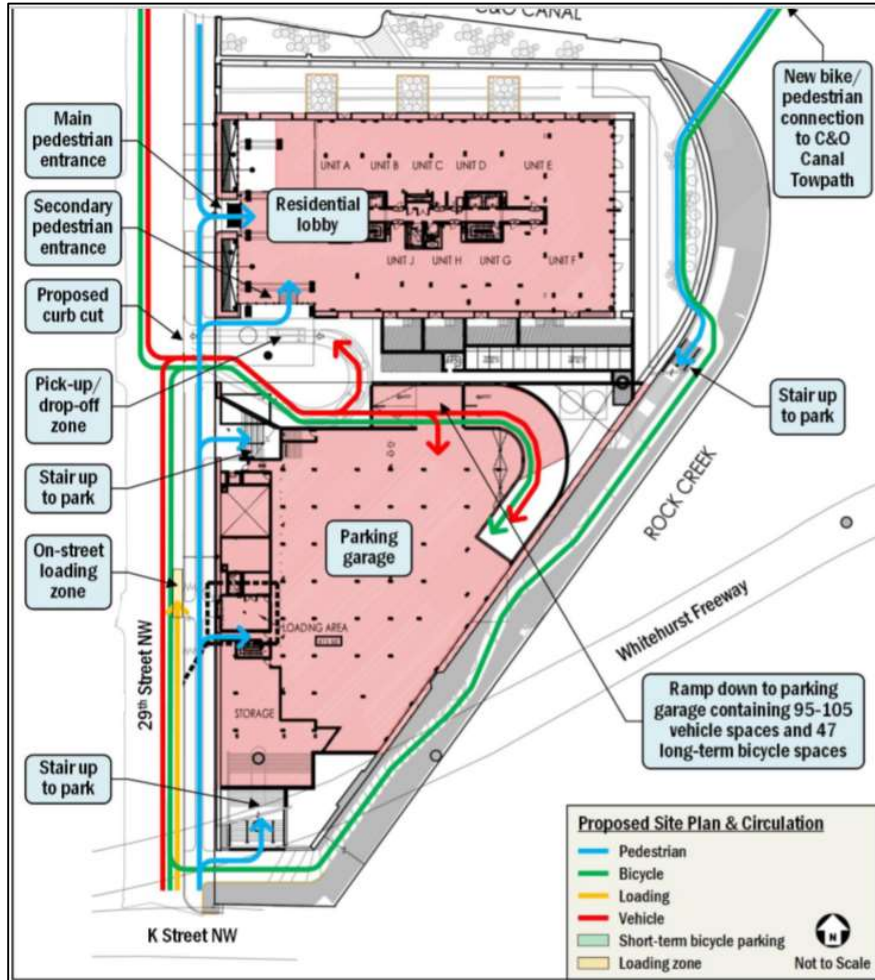


Figure 1. Site Plan and Circulation (Source: Gorove/Slade 3/15/2021, Transportation Statement, Figure 4)

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 provided trip generation estimates which utilized the rates published in the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 10th Edition* (Land Use Code 221 Multifamily Housing (Mid-Rise)) and the assumed mode-split to convert base vehicular trips to base person trips

using average auto occupancy data and then back to vehicular, transit, bicycle, and pedestrian trips. DDOT finds these methods appropriate.

A mode split of 90% automotive and 10% non-automotive was assumed in the subject analysis. It was informed by census data, WMATA ridership data, and the proposed parking supply. Figure 2 below shows the trip generation summary. The proposed residential conversion is expected to generate 23 total vehicular trips in the weekday morning peak hour and 29 in the evening peak. The level of trip generation is below the threshold of 25 peak hour trips in the peak direction (either inbound or outbound) at which DDOT requires a Comprehensive Transportation Review (CTR) study with vehicular capacity analysis.

Mode	Mode Split	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Auto (veh/hr)	90%	6	17	23	19	10	29
Transit (ppl/hr)	2%	0	1	1	0	1	1
Bike (ppl/hr)	3%	0	1	1	1	0	1
Walk (ppl/hr)	5%	0	2	2	1	1	2

Figure 2. Trip Generation Summary (Source: Gorove/Slade 3/15/2021, Transportation Statement, Table 1)

STREETSCAPE AND PUBLIC REALM

DDOT’s lack of objection to this application should not be viewed as an approval of public space design. All elements of the project proposed in public space, such as grading, curb cuts, sidewalk, bike racks, and vaults, require the Applicant to pursue a public space permit through DDOT’s permitting process.

DDOT recommends the Applicant schedule a Preliminary Design Review Meeting (PDRM) to ensure their proposal meets DDOT standards. The Applicant will be required to provide at a minimum a 6-ft wide, continuous sidewalk and will need to coordinate with the Urban Forestry Department’s Ward 2 Arborist. The proposed curb cut on 29th Street will need Public Space Committee (PSC) approval and the mountable curb proposed near the loading is non-standard may also need PSC Approval. The curbside management proposal will be reviewed and appropriate signage/restrictions determined during permitting. If multi-space meters are required, they must be installed at the Applicant’s expense.

DDOT expects the adjacent public space to meet all District standards. The Applicant should refer to Titles 11, 12A, and 24 of the [DCMR](#), and the most recent version of DDOT’s [Design and Engineering Manual](#), and DDOT’s [Public Realm Design Manual](#) for public space regulations and design guidance. A permit application can be filed through the DDOT [Transportation Online Permitting System](#) (TOPS) website.

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