


**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DEPARTMENT OF TRANSPORTATION**



**d. Policy, Planning and Sustainability Administration**

**MEMORANDUM**

**TO:** Sara Bardin  
Director, Office of Zoning

**FROM:** Samuel Zimbabwe   
Associate Director

**DATE:** January 12, 2014

**SUBJECT:** ZC Case No. 13-08 – 1333 Alabama Avenue SE – Congress Heights Metro

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**PROJECT SUMMARY**

Square 5914, LLC (the “Applicant”) proposes a mixed-use Planned Unit Development (PUD) at 1333 Alabama Avenue SE (Sq. 5914) on two lots at the Congress Heights Metro station. The total development proposal with a residential lot and an office lot will contain:

- 206 residential units;
- 220,447 square feet (SF) of office space;
- 19,452 SF of retail;
- 218 vehicle parking spaces; and
- 76 long-term bicycle parking spaces.

**SUMMARY OF DDOT REVIEW**

DDOT is committed to achieving an exceptional quality of life in the nation’s capital by encouraging sustainable travel practices, constructing safer streets, and providing 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, multi-administration review of the case materials submitted by the Applicant, DDOT finds:

**Site Design**

- The site is located on top of the Congress Heights Metro Station;

- The proposed access to parking and loading facilities via a private alley is acceptable and meets DDOT standards;
- The proposed loading facilities are adequate to serve the site without any backing maneuvers in public space;
- The proposed Loading Management Plan is acceptable; and
- All utility vaults are located on private property.

### **Travel Assumptions**

- The action is expected to generate a significant number of new vehicle and transit trips;
- The amount of vehicle parking is 15% above current zoning, and is appropriately captured in the anticipated vehicle trip generation rates; and
- The actual number of vehicle trips generated by the site could be reduced with a robust Transportation Management Plan (TDM).

### **Analysis**

- The Applicant utilized sound methodology to perform the analysis;
- Impacts to the intersections of Alabama Ave with 7<sup>th</sup> and 8<sup>th</sup> streets SE are not known because they were not included in the agreed scope;
- The intersections of Alabama Avenue with Wheeler Road SE, 15<sup>th</sup> Street SE, and 15<sup>th</sup> Place SE are significantly impacted by the proposed development requiring further mitigations;
- The site is well-served by rail and bus services;
- Pedestrian facilities immediately adjacent to the site should be upgraded to DDOT Standards; and
- The proposed TDM plan is not sufficiently robust to justify the proposed non-auto mode split, meaning potential impacts could be worse than projected.

DDOT has no objection to the requested approval with the following conditions:

#### **Mitigations**

- The Applicant design and install a signal at Alabama Avenue and 15th Street SE, subject to DDOT approval;
- Install 22 short-term bicycle spaces in public space; and
- In addition to the TDM measures proposed in the January 9, 2015 memorandum to DDOT, the Applicant should unbundle parking costs from the price of all commercial and residential leases.

The Applicant provided additional information on January 9, 2015 that is currently under review, which could modify or impact the above requested mitigation measures. If needed, any changes to DDOT's position will be presented during our testimony at the January 22<sup>nd</sup>, 2015 hearing.

#### **Continued Coordination**

Given the complexity and size of the action, the Applicant is expected to continue to work with DDOT on the following matters:

- Public space, including curb and gutter, street trees and landscaping, street lights, sidewalks, and other features within the public rights of way, are expected to be designed and built to DDOT standards;
- Pedestrian upgrades at the intersection of Alabama Avenue and 13<sup>th</sup> Street to include updated crosswalks and ramps;
- Proposed on-street parking along Alabama Avenue in front of site;

- Peak hour parking restrictions along Alabama Avenue;
- Curbside signage plan needed to remove one parking spot at each driveway location to improve sight distance;
- The design and installation of the signal at Alabama Avenue and 15<sup>th</sup> Street; and
- The installation of electric car charging stations. DDOT recommends that at least one electric vehicle charging stations be provided in each building.

## **TRANSPORTATION ANALYSIS**

DDOT requires applicants who request PUD approval from the Zoning Commission complete a Comprehensive Transportation Review (CTR) in order to determine the PUD's impact on the overall transportation network. Accordingly, an applicant is expected to show the existing conditions for each transportation mode affected, the proposed impact on the respective network, and any proposed mitigations, along with the effects of the mitigations on other travel modes. A CTR should be performed according to DDOT direction. The Applicant and DDOT coordinated on an agreed-upon scope for the CTR that is consistent with the scale of the action. After analysis, DDOT and the Applicant determined that some intersections not included in the scope could experience increases in delay. See Roadway Capacity and Operation section for more detail.

The review of the analysis is divided into four categories: site design, travel assumptions, analysis, and mitigations. The following review provided by DDOT evaluates the Applicant's CTR to determine its 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**

The site is located on top of the Congress Heights Metro station and will envelope the southern entrance on Alabama Avenue. Pedestrian access will occur on both Alabama Avenue and 13<sup>th</sup> Street at various building entrances. A new private alley with a curb cut on 13<sup>th</sup> Street SE and Alabama Avenue is proposed and meets DDOT standards. All loading and off-street parking access will occur via the private alley. See Figure 1 below for details:

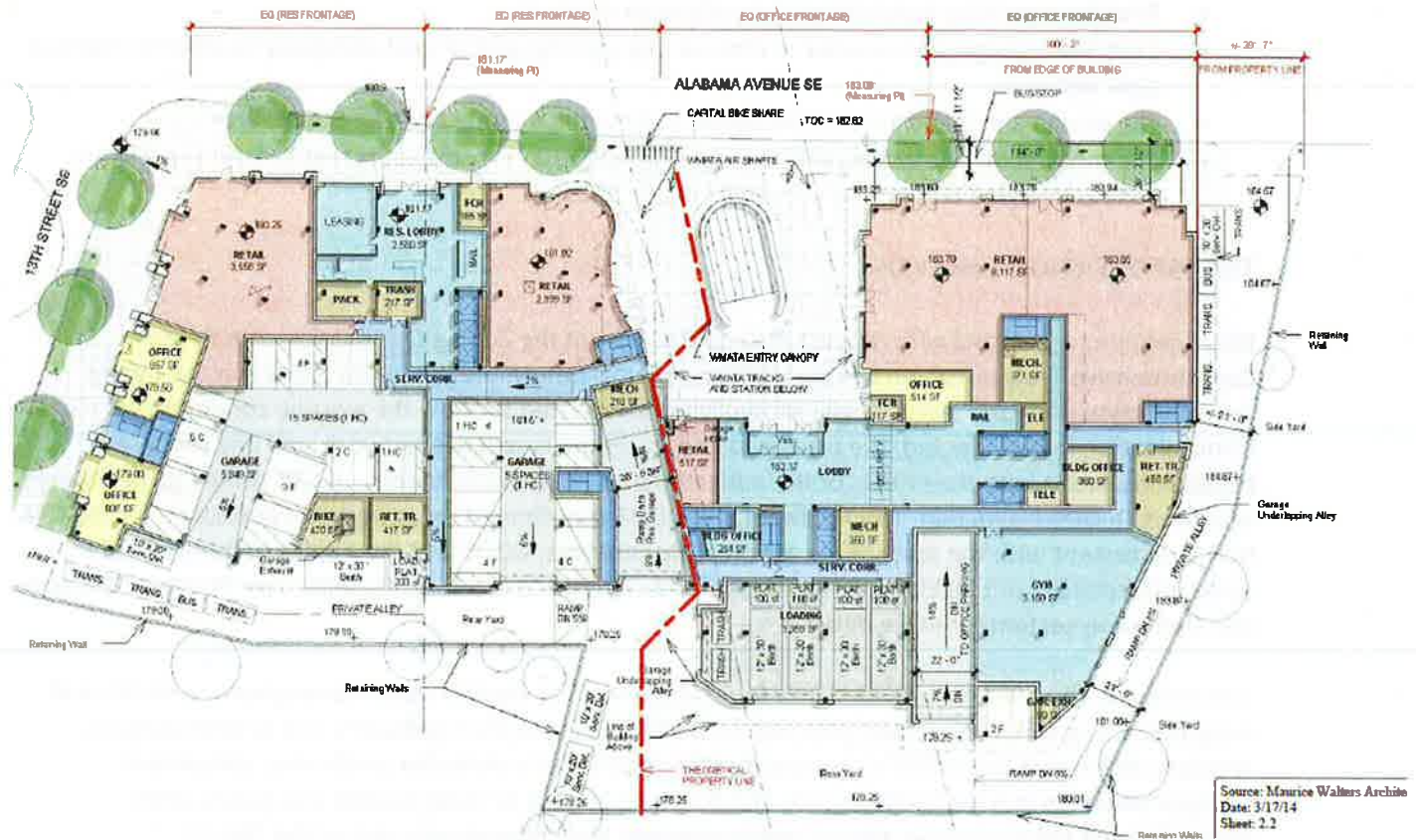


Figure 1 Site Design and Access (Source: Well & Associates)

### 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. This often results in loading being accessed through an alley network.

The Office Building meets all zoning loading requirements, while the Residential Building seeks relief from the 55 foot loading berth requirement. In lieu of the 55 foot berth, the Residential Building will provide a 30 foot loading berth and a loading management plan outlined in their CTR. All loading facilities are designed to accommodate front-in/front-out movements in compliance with DDOT standards. DDOT finds that the Loading Management Plan as proposed sufficiently addresses loading impacts.

### 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 and landscaping, street lights, sidewalks, and other appropriate features within the public rights of way bordering the site.

The Applicant must work closely with DDOT and the Office of Planning 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 the District of Columbia Municipal Regulations, DDOT's Design and Engineering 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. Specifically, DDOT suggests that the Applicant participate in a Preliminary Design Review Meeting (PDRM) to address design related issues prior to the submission of public space permit applications. DDOT notes the importance of maximizing the width of sidewalks along the perimeter of the site to accommodate pedestrian and bicycle activity, while maintaining landscaped areas along the building frontage in the "parking" area adjacent to the property line. Finally, DDOT expects utility vaults to be accommodated on private property and all proposed curb cuts are subject to the public space permitting process.

### Sustainable Transportation Elements

Sustainable transportation measures target to promote environmentally responsible types of transportation in addition to the transportation mode shift efforts of TDM programs. These measures can range anywhere from practical implementations that would promote use of vehicles powered by alternative fuels to more comprehensive concepts such as improving pedestrian access to transit in order to increase potential use of alternative modes of transportation. Within the context of DDOT's development review process, the objective to encourage incorporation of sustainable transportation elements into the development proposals is to introduce opportunities for improved environmental quality (air, noise, health, etc.) by targeting emission-based impacts.

Based on the size of the proposed development and the number of vehicular parking spaces, DDOT recommends that the Applicant provide at least one 240-volt electric car charging station in the Residential Building garage and at least one station in the Office Building garage.

### **Travel Assumptions**

The purpose of the 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.

### Background Developments and Regional Growth

As part of the analysis of future conditions, DDOT requires applicants to account for future growth in traffic on the network or what is referred to as background growth. The Applicant coordinated with DDOT on the appropriate background developments to include in the analysis. Only projects that were reasonably expected to be approved and constructed were included in the analysis. Three background developments – Archer Park, U.S. Coast Guard Headquarters Building, and Asheford Court Phase II were included.

DDOT also requires applicants account for regional growth. This can be done by assuming a general growth rate or by evaluating growth patterns forecast in MWCOG's regional travel demand model. The Applicant coordinated with DDOT on an appropriate regional growth rates based on volume projections based on DDOT's historical average daily traffic volumes and a one percent per year annual compound was used.

### Off-Street Vehicle Parking

The overall parking demand created by the development is primarily a function of land use, development square footage, and price/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, and proximity to transit.

218 off-street parking spaces are proposed for the site, a 15% increase over the 190 parking spaces required by current zoning. Given the site's location on top of a Metro Station, DDOT finds the increased parking supply unnecessary. Thus, reducing the supply of parking would serve to reduce the impact on the District's roadways.

### Trip Generation

The Applicant provided trip generation estimates utilizing the Institute of Traffic Engineers (ITE) Trip Generation Manual and the following ITE land use codes were analyzed:

- Residential: Apartment (Code 220)
- Office: General Office (Code 710)
- Retail: Shopping Center (Code 820)

DDOT finds the use of these ITE codes appropriate.

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, availability and cost of parking, among many others.

The Applicant in consultation with DDOT developed the following auto split assumptions informed by WMATA's 2005 Development-Related Ridership Survey:

- 55% Auto – Office
- 40% Auto – Residential
- 40% Auto – Retail

The Applicant did not provide a non-auto mode split break down as requested during scoping, thus DDOT cannot confirm that the non-auto trip generation projections for transit, bike, and pedestrian trips are accurate. Based on the trip generation and the auto mode split assumptions above, see below figure for the Applicant predicted level of weekday peak hour trip generation:

Land Use	AM Peak Hour			PM Peak Hour			ADT	
	In	Out	Total	In	Out	Total		
<b>Proposed Development</b>								
206 DU Apartment (LUC 220)	Total Trips	21	84	105	85	46	131	1,372
	Internal Trips	1	1	2	14	9	23	255
	External Trips	20	83	103	71	37	108	1,117
	Non-auto Trips	12	49	61	43	22	65	670
	Transit	11	45	56	39	20	59	614
	Bike	0	0	0	0	0	0	3
	Pedestrian	1	4	5	3	2	5	52
	Vehicle Trips	8	34	42	28	15	43	447
220,447 SF Office (LUC 710)	Total Trips	317	43	360	55	270	325	2,394
	Internal Trips	--	--	--	3	4	7	103
	External Trips	317	43	360	52	266	318	2,291
	Non-auto Trips	143	19	162	23	120	143	1,031
	Transit	143	19	162	23	120	143	1,031
	Bike	0	0	0	0	0	0	0
	Pedestrian	0	0	0	0	0	0	0
	Vehicle Trips	174	24	198	29	146	175	1,260
19,452 SF Retail (LUC 820)	Total Trips	35	22	57	96	104	200	2,343
	Internal Trips	2	1	3	11	15	26	316
	External Trips	33	21	54	85	89	174	2,027
	Non-auto Trips	20	13	33	51	53	104	1,216
	Transit	16	10	26	40	43	82	953
	Bike	0	0	0	1	1	2	16
	Pedestrian	4	3	7	10	10	20	248
	Vehicle Trips	13	8	21	34	36	70	811
Pass-by Trips	1	1	2	9	9	18	203	
New External Trips	12	7	19	25	27	52	308	
<b>Existing Buildings to be Demolished</b>								
48 DU Apartment (LUC 220)	Total Trips	5	22	27	29	15	44	414
	Internal Trips	--	--	--	--	--	--	--
	External Trips	5	22	27	29	15	44	414
	Non-auto Trips	3	13	16	17	9	26	248
	Transit	3	12	15	16	8	24	227
	Bike	0	0	0	0	0	0	1
	Pedestrian	0	1	1	1	1	2	19
	Vehicle Trips	2	9	11	12	6	18	166
<b>Net Additional Site Trips</b>								
Total Trips	368	127	495	207	405	612	5,695	
Internal Trips	3	3	6	28	28	56	674	
External Trips	365	124	489	179	377	556	5,021	
Non-auto Trips	172	68	240	100	186	286	2,669	
Transit	167	62	229	86	174	260	2,371	
Bike	0	0	0	1	1	2	18	
Pedestrian	5	6	11	12	11	23	281	
Vehicle Trips	193	56	249	79	191	270	2,352	
Pass-by Trips	1	1	2	9	9	18	203	
Net New External Vehicle Trips	192	55	247	70	182	252	2,149	

Figure 2 Peak Hour Trip Generation (Source: Wells & Associates)

As shown, the proposed action is expected to generate a significant number of new transit and vehicular trips during the weekday peak hours, and DDOT believes that bicycle trips might be underrepresented in their analysis.

### Trip Distribution and Assignment

The Applicant assumed that trips related to each of the land uses would travel to and from different parts of the region in a manner specific to the land use. Therefore, the Applicant created unique trip distribution rates for retail, office, and residential trips. DDOT is in agreement with the methodology used to determine trip distribution.

### Study Area and Data Collection

The Applicant in conjunction with DDOT identified seven intersections where detailed vehicle, bicycle, and pedestrian counts would be conducted and a level of service analysis would be performed. These intersections are immediately adjacent to the site and include intersections radially outward from the site that has the greatest potential to see moderate to significant increases in vehicle delay.

The Applicant conducted counts on April 4, 2013. DDOT agrees with the time frame and collection dates. The collection date did not occur during Congressional recess or outside of the DC Public School calendar.

### Analysis

To determine the action's impacts on the transportation network, a CTR includes an extensive multi-modal analysis of the existing baseline conditions, future conditions without the proposed action, and

future conditions with the proposed development. The Applicant completed their analysis based on the assumptions described above.

### Roadway Capacity and Operations

DDOT aims to provide a safe and efficient roadway network that provides for the timely movement of people, goods and services. As part of the evaluation of travel demand generated by the site, DDOT requests analysis of traffic conditions for the agreed upon study intersections for the current year and after the facility opens both with and without the site development or any transportation changes.

Analysis provided by the Applicant shows that six intersections within the study area have at least one approach that will operate under failing conditions as measured by Level of Service (LOS):

- Alabama Avenue/Randle Place
- Alabama Avenue/Wheeler Road
- Alabama Avenue/13<sup>th</sup> Street
- Alabama Avenue/Stanton Road
- Alabama Avenue/15<sup>th</sup> Street
- Alabama Avenue/15<sup>th</sup> Place

DDOT acknowledges that not all intersections which will experience new trips are included in the study area. In particular, the study area did not include the intersections of Alabama Avenue with 7<sup>th</sup> and 8<sup>th</sup> streets. DDOT found a traffic balancing error on Alabama Avenue between Randle Place and Wheeler Road. After further analysis, the Applicant confirmed that under current conditions between 400 and 600 vehicles in the evening peak hour use those two streets as a cut-through to Malcom X Avenue. DDOT is concerned that these two intersections were not included in their analysis and will be impacted by the project. It is possible that delays and queuing at these two intersections could serve to artificially constrain traffic volumes at intersections within the study area and should have been included in their analysis.

Capacity analysis results for the Total Future Conditions show significant site generated impacts at the intersection of Wheeler Road. In comparison to the Background Conditions, the overall intersection delay is projected to increase by 46% (over a minute and a half increase in delay) and the delay on the eastbound through and westbound left/through movements is projected to increase 68% and 59%, respectively, during the morning peak hour. The Applicant proposes in addition to minor signal adjustments recommendations, to provide a one year carshare or Capital Bikeshare membership to all residential units each time the unit turns over during the first five years in order to reduce the impact at this physically constrained intersection.

Capacity analysis results for Total Future Conditions show significant site generated impacts at the intersections of 15<sup>th</sup> Street and 15<sup>th</sup> Place. In comparison to the Background Conditions, the northbound approach of 15<sup>th</sup> Street degrades to LOS F during the morning peak hour and has a 32% increase in delay during the afternoon peak hour. Additionally, during the morning peak hour, the southbound approach of 15<sup>th</sup> Place degrades to LOS F due to site-generated traffic. A signal was found to be warranted and would improve operations at 15<sup>th</sup> Street if combined with peak hour parking restrictions. DDOT expects the Applicant to design and install the signal at 15<sup>th</sup> Street in order to mitigate their impact at this particular intersection.



In addition, the Applicant proposes a series of minor signal adjustments to each impacted intersection. While these signal timings adjustments might improve one particular intersection, it could have a significant impact on the overall operations of the Alabama Avenue corridor. Thus, minor signal timing adjustments in isolation are not considered appropriate mitigation measures unless accompanied by a corridor level analysis.

### Transit Service

The District and Washington Metropolitan Area Transit Authority (WMATA) have partnered to provide extensive public transit service in the District of Columbia. DDOT's vision is to leverage this investment to increase the share of non-automotive travel modes so that economic development opportunities increase with minimal infrastructure investment.

The site is located on top of the Congress Heights Metro Station and is served by the Green Line.

The site is well-served by high-frequency bus routes currently located across the street, which include:

- W2, W3 – United Medical Center - Anacostia Line
- W4 – Deanwood – Alabama Avenue Line
- W6, W8 – Garfield – Anacostia Loop Line
- 94 – Stanton Road Line
- A6, A7, A46 – Anacostia – Congress Heights Line
- M8 & M9 – Congress Heights Shuttle Line
- 92 & 93 – U street-Garfield Line
- D51 – Duke Ellington School of the Arts Line

The Applicant did not provide headway or capacity information for the above bus services servicing the site.

While the site is well served by Metro rail and bus service, transit riders must walk to/from the site and the rail station or bus stop. Ensuring adequate pedestrian facilities to connect site visitors with transit options is critical for making transit accessible and realizing the anticipated mode splits. DDOT expects that the Applicant will upgrade the ramps and crosswalks immediately adjacent to the site to DDOT standards.

### Pedestrian Facilities

The District of Columbia is committed to enhance the pedestrian accessibility by ensuring consistent investment in pedestrian 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 pedestrian trips. Walking is expected to be an important mode of transportation for this development. Transit trips are likely to involve a walking component to and from the site to the bus stops across the street.

A robust qualitative analysis was not provided in the CTR, but according to the Applicant, sidewalks are present along the study area, but it is unclear if they meet DDOT standards. A qualitative analysis of existing curb ramps is missing. DDOT expects that the Applicant will upgrade all curb ramps along its site and their corresponding receiving ramps to DDOT standards along with any needed crosswalks. Design details will be worked out during the public space permitting process with DDOT.

## Bicycle Facilities

The District of Columbia is committed to enhance 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. Currently, one Capital Bikeshare station is located on the site.

The Applicant is required to provide 69 long-term bicycle parking spaces and has proposed 76 long-term spaces on the first floor and first below-grade garage level with additional bicycle parking on the second level of the garage. It is unclear how many spaces are to be provided on the second level, which would not count toward the required amount of parking. No short-term bicycle parking provision was included, but DDOT expects the Applicant to provide a total of 22 short-term bicycle spaces (10-residential, 6-office, 6-retail) in public space near building entrances.

## Safety

DDOT requires that the Applicant conduct a safety analysis to demonstrate that the site will not create new, or exacerbate existing safety issues for all travel modes. DDOT asks for an evaluation of crashes at study area intersections as well as a sight distance analysis along the public space where there is expected to be conflicts between competing modes (e.g. crosswalks, driveway entrances, etc.).

The Applicant's analysis of DDOT crash data reveals three intersections within the study area that have a crash rate of 1.0 Million Entering Vehicles (MEV) or higher. A significant portion of the crashes are designated as "rear end" or "side swipe" crashes.

<b>Intersection</b>	<b>Number of Crashes</b>	<b>Rate</b>
<b>Alabama Avenue/Randle Place</b>	<b>9</b>	<b>0.89</b>
<b>Alabama Avenue/Wheeler Road</b>	<b>26</b>	<b>0.82</b>
<b>Alabama Avenue/11<sup>th</sup> Place</b>	<b>9</b>	<b>0.60</b>
<b>Alabama Avenue/13<sup>th</sup> Street</b>	<b>18</b>	<b>1.23</b>
<b>Alabama Avenue/15<sup>th</sup> Street</b>	<b>10</b>	<b>0.60</b>
<b>Alabama Avenue/15<sup>th</sup> Place</b>	<b>31</b>	<b>1.82</b>
<b>Alabama Avenue/Stanton Road</b>	<b>52</b>	<b>2.47</b>

Figure 3 Crash Data Summary (Source: Wells & Associates)

DDOT agrees with the Applicant's conclusion that based on the limited information provided, no discernable pattern, trend or causation could be identified.

The Applicant completed a sight distance evaluation at the proposed curb cuts on 13<sup>th</sup> street and Alabama Avenue. Based on their analysis, one parking space might need to be eliminated on 13<sup>th</sup> street and another on Alabama Avenue. DDOT will further coordinate on the curbside signage needed to increase visibility with the Applicant during the permitting process.

## **Mitigations**

As part of all major development review cases, DDOT requires the Applicant to mitigate the impacts of the development in order to positively contribute to the District's transportation network. The mitigations must sufficiently diminish the action's vehicle impact and promote non-auto travel modes. This can be done through Transportation Demand Management (TDM), physical improvements, operations, and performance monitoring.

DDOT preference is to mitigate vehicle traffic impacts first through establishing an optimal site design and operations to support efficient site circulation. When these efforts alone cannot properly mitigate an action's impact, TDM measures may be necessary to manage travel behavior to minimize impact. Only when these other options are exhausted will DDOT consider capacity-increasing changes to the transportation network because such changes often have detrimental impacts on non-auto travel and are often contrary to the District's multi-modal transportation goals.

The following analysis is a review of the Applicant's proposed mitigations and a description of DDOT's suggested conditions for inclusion in the PUD.

### New Signal at 15<sup>th</sup> Street and Alabama Avenue

As discussed in our Analysis section, site generated impacts at the intersection of 15th Street and Alabama Avenue is significant. In comparison to the Background Conditions, the northbound approach of 15th Street degrades to LOS F during the morning peak hour and has a 32% increase in delay during the afternoon peak hour due to the project. A signal was found to be warranted under background conditions alone, but there are no existing plans or funding for a signal at this intersection. Given the project's increased impact of 32% in delay, the project alone will significantly exacerbate this intersection. DDOT expects the Applicant to design and install the signal at 15th Street in order to mitigate their impact at this particular intersection.

### Transportation Demand Management

As part of all major development review cases, DDOT requires the Applicant to produce a comprehensive Transportation Demand Management (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, 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.

The Applicant proposes the following summarized TDM strategies:

- Designate a TDM coordinator responsible for organizing and marketing the TDM plan;

- Provide information and links on their website;
- Install a transit information screen in each building lobby to display transit and other alternate mode information;
- Provide two carsharing spaces, if there is interest from carsharing vendor; and
- Shower and changing facilities for on-site employees.

On January 9<sup>th</sup>, 2014, the Applicant added the following measure:

- Provide a one-time annual carshare or bikeshare membership for each residential unit each time the unit turns over in the first five years the building is in operation.

DDOT finds the TDM plan to be insufficient to encourage non-auto travel. Accordingly, DDOT requests the following additions to the Applicant's TDM plan as a condition of approval:

- Unbundle parking costs from the price of lease or purchase; and
- Install 22 short-term bicycle spaces, the equivalent of 11 racks in public space.

The final design, including location of short-term bicycle facilities will be determined during the public space permitting process.

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