

**TECHNICAL MEMORANDUM**

To: DC Zoning Commission

Cc: Dave Avitabile Goulston & Storrs

From: Maris Fry, P.E.  
 Daniel VanPelt, P.E., PTOE

Date: March 8, 2019

Subject: **501 Eye Street SW (ZC Case No. 17-21)**  
**Response to United Neighbors of Southwest Comments on CTR**

This memorandum provides responses to comments outlined in the United Neighbors of Southwest (UNSW) letter submitted into the record on February 5, 2019 as it relates to the Comprehensive Transportation Review (CTR). The comments from UNSW, shown in the column on the left, include excerpts from the CTR followed by commentary in bold lettering. Responses by Gorove/Slade are included in the column on the right.

UNSW Comment	Gorove/Slade Response
<p><i>"The site provides sufficient parking and loading facilities to accommodate demand.... On-street parking is highly utilized surrounding the site and expected to be negligibly impacted by the proposed development." (p.11)</i></p> <p><b>This is internally inconsistent. If on-street parking is already highly utilized and more cars will be added by residents in and visitors to the development, how can the CTR conclude that on-street parking will be negligibly impacted?</b></p>	<p>Residents and daily employees will have sufficient on-site parking (or secured off-site parking). Additionally, the Applicant will include a provision for all residential unit purchases restricting the residents from obtaining Residential Parking Permits. Visitors of the development, particularly those associated with STC education and rehearsal spaces will be encouraged to utilize non-auto modes of travel, and those that do drive will be directed to park in the nearby parking garages.</p>
<p><i>"As shown in the tables, parking is heavily occupied during the midday and evening peaks for both the summer and non-summer days. RPP parking is at least 88% occupied during all scenarios outlined in the tables; however, block faces directly surrounding the site have some availability during the day. Alternatively, many block faces that provide non-RPP, public parking are observed to have an occupancy of over 100% - indicated that illegal parking may occur within the on-street parking study area. Overall, the parking</i></p>	<p>See previous response.</p>

<p><i>occupancy study shows that on-street parking heavily utilized surrounding the site.” (p. 12-13)</i></p> <p><b>The CTR acknowledges that parking in the area is heavily occupied or over-occupied but fails to acknowledge that the additional cars to be added by the project will worsen the problem.</b></p>	
<p><i>“Adequate pick-up/drop-off space is proposed along I Street to serve STC’s summer camp.” (p. 11) “The site is expected to generate pick-up/drop-off activity for summer classes and camps.... The proposed curbside management plan allows for approximately 140 feet (or approximately 7 car lengths) to be designated as pick-up/drop-off space for STC’s summer camps.” (p. 14)</i></p> <p><b>The pick-up space is proposed; it does not actually exist. The proposal would require removing 140 feet of public parking, or parking spaces, from a block that the CTR acknowledges already has “an occupancy of over 100%.”</b></p>	<p>The proposed pick-up/drop-off plan in the CTR aims to accommodate STC needs while minimizing impacts to RPP parking. The proposed plan only eliminates approximately 10 feet of RPP space, which depending on the spacing of parked vehicles may have a negligible impact on RPP parking. The additional pick-up/drop-off space is obtained from an existing curb cut that is to be closed and a portion of the school curbside that is currently unrestricted during non-school hours. The proposal for this space includes restricting parking during the same hours in the summer months but allowing parking during the evening and overnight hours, similar to what occurs today during the school year.</p> <p>While the Applicant can support a particular plan, DDOT has ultimate control over curbside management and can make changes as they see fit. DDOT has since proposed an alternative curbside management plan, and the Applicant is reviewing the alternative plan with UNSW, ANC 6D, DDOT, and other stakeholders.</p>
<p><i>“The site is designed to accommodate head-in/head-out maneuvers into the proposed loading area, which includes a 30’ loading berth and a 20’ service/delivery space. Truck turning diagrams are included in the Technical Attachments.” (p. 12)</i></p> <p><b>No “technical attachments” were filed with the Zoning Commission as part of the CTR.</b></p> <p><b>The head-in/head-out truck maneuvers described in the PUD would require extensive backing up for trucks, with the accompanying load beeping, right up to the property line next to a row of townhouses. The Office of Planning set-down report of January 19, 2018 explicitly said the transportation report should address these turning maneuvers, but the CTR has not done so and has not</b></p>	<p>As is customary, the technical attachments were not submitted into the Zoning Commission record, but they were filed with the District Department of Transportation at the same time as the CTR and they were provided to UNSW upon request. Additionally, the turning maneuvers have been included as an attachment to this memorandum.</p> <p>To mitigate the impacts of loading activity, the Applicant has agreed to limit trash and recycling collection hours to 10:00 AM to 4:00 PM, Monday through Friday. No trash or recycling collection will occur on the weekends. All other deliveries and moving activities will be limited to 9:00 AM to 5:00 PM. Except in the case of an emergency, service vehicles shall be limited to 7:00 AM to 8:00 PM.</p>

<p><b>suggested any improvements or mitigations to the plans in the PUD proposal.</b></p>	<p>Additionally, a space within the garage has been reserved for costume shop deliveries, removing this delivery activity from the ground-floor loading area.</p>
<p><i>“Limited performances will be held on site.” (p. 11)</i></p> <p><b>The CTR makes no provision for extra parking requirements during these performances, nor even an estimate of how many people/cars are likely to attend.</b></p>	<p>No public performances are envisioned for the Project.</p> <p>With respect to other activities, STC will notify all visitors to the site that parking is not available on site and that street parking is extremely limited. STC will provide information on transit alternatives as well as on nearby parking garages with public parking.</p>
<p><i>“A curb cut along 6<sup>th</sup> Street will be shifted slightly to the south. (p. 11)</i></p> <p><b>The CTR does not say if this will reduce the number of existing parking spaces.</b></p>	<p>Although the curb cut will be shifted slightly to meet DDOT design requirements, it will not result in a loss of parking spaces. The parking signage will simply shift with the curb cut resulting in a few additional feet of parking to the north, and a few less feet of parking to the south. The changes will not change the overall number of parking spaces that can be accommodated on either length of curb.</p>
<p><i>“Vehicular access along I Street could result in increased conflicts with pedestrian and bicycles, particularly given the presence of bike lanes along I Street.” (p. 12)</i></p> <p><b>The CTR gives this as an explanation for why the vehicle entrance has been placed on 6<sup>th</sup> Street. The clear implication, however, is that vehicular access along 6<sup>th</sup> Street would result in increased conflicts with pedestrians and bicycles along 6<sup>th</sup> Street.</b></p>	<p>It is true that any vehicular access point has inherent conflicts with pedestrians and bicycles. However, 6<sup>th</sup> Street is a more appropriate access location than I Street as 6<sup>th</sup> Street is classified as a local street and I Street is classified as a minor arterial. There is also less pedestrian and bicycle traffic along 6<sup>th</sup> Street. For instance, during the AM peak hour, 15 bicycles were observed along westbound I Street and 3 were observed along northbound 6<sup>th</sup> Street. During the PM peak hour, 6 bicycles were observed along westbound I Street and 2 were observed along northbound 6<sup>th</sup> Street. Additionally, having vehicular access from 6<sup>th</sup> Street instead of I Street results in fewer potential conflicts with the adjacent Amidon Bowen Elementary School and the proposed pick-up/drop-off area for STC.</p> <p>Based on the above reasons, and based on DDOT’s public space policies, DDOT has indicated their preference for access on 6<sup>th</sup> Street. This has been their preference since the beginning of the project.</p>
<p><i>“The Project will [supply] a total of 55 parking spaces. Of these, 25 will be dedicated to residential uses and 30 spaces will be dedicated to STC uses, including 15 off-site spaces.”</i></p>	<p>The SWNA agreement was written at a time when the proposed project was much larger in scale. At that time the project proposed approximately 143 residential units,</p>

<p><b>The CTR does not address the STC written commitment in the SWNA Agreement, a legal contract, that “a minimum of 70 off street parking spaces shall be provided on the property for use by STC and residents of the Development.” (Exhibit 34, para 5(b).)</b></p>	<p>approximately 45,000 square feet of space for STC, 24 actor housing units, and 20 fellows housing units. The site would be served by 70 parking spaces of which 45 would be for residential uses and 25 would be for STC uses.</p> <p>The project has decreased in size significantly since then to 64 residential units, approximately 31,500 square feet of space for STC, 18 actor housing units, and 18 fellows housing units. The proposed parking supply has decreased accordingly; however, the residential parking ratio has actually increased from 0.31 to 0.39 spaces per unit, and the number of STC spaces has increased from 25 to 30 spaces. Therefore, the relative parking supply has increased.</p>
<p><i>“Summary of daily activity” (Tables 4 and 5 on pp. 18-19)</i></p> <p><b>This section appears to show that the proposed 30 parking spaces for STC uses (15 on site and 15 off site) will not be nearly enough for STC’s anticipated needs. Table 4 indicates that 28-32 spaces will be needed for STC staff’s regular daily activity (80 full time staff x 30% = 24 spaces; 3-7 part time staff x 50% = 2 to 4 spaces; and 2-7 volunteers x 60% - 2-4 spaces). However, Table 5 lists many more cars that will be coming for regular activities (16 home school x 80% = 13 spaces; 20 workshop and training x 25% = 4 spaces; 10-40 MAC and 1-4 instructors x 70% = 8-31 spaces; 10 summer camp instructors x 68% = 7 spaces; 20-50 actors x 10% = 2-5 spaces; Ford Theater rehearsals 25 actors x 20% = 5 spaces; ACA rehearsals 20 actors x 10% = 2 spaces). Even by the CTR’s own listing, therefore, 69-99 spaces will be needed for regular STC daily activities for much of every year, while only 30 are provided.</b></p>	<p>The 30 spaces allocated to STC are adequate for daily activity as part-time/volunteer staff are periodic or only once per week. The majority of the time only full-time staff will be accessing the site.</p> <p>As it relates to the uses outlined on Table 5, these events do not take place simultaneously as they are limited by the available space. For example, higher attendance educational events can only take place when rehearsals are not going on as they utilize overlapping spaces within the building. Additionally, these events take place at different times of the year and many occur seldomly. Additional information on each use is included below:</p> <p>Home School – This program is for young students so it will be pick-up/drop-off activity only. People will not be driving to the site and parking.</p> <p>Workshops and Training – These will only be occurring approximately 5 times per year. Attendees will be informed of the limited on-street parking and be encouraged to take alternate modes of transportation, taxis, or TNCs as opposed to driving personal vehicles. If attendees choose to drive they will be directed to nearby parking garages.</p> <p>MAC – Attendees will be informed of the limited on-street parking and be encouraged to take alternative modes of transportation, taxis, or TNCs as opposed to driving personal vehicles. If attendees choose to drive they will be directed to nearby parking garages.</p>

	<p>Summer Camp – Instructors will be informed of the limited on-street parking and be encouraged to take alternative modes of transportation, taxis, or TNCs as opposed to driving personal vehicles. If instructors choose to drive they will be directed to nearby parking garages.</p> <p>STC, Ford Theater, and ACA Rehearsals – All actors traveling to the site for rehearsals will be informed of the limited on-street parking and be encouraged to take alternative modes of transportation, taxis, or TNCs as opposed to driving personal vehicles. If actors choose to drive they will be directed to nearby parking garages.</p>
<p><i>“The Applicant will include a provision for all residential unit purchases restricting the residents from obtaining Residential Parking Permits.” (p. 15)</i></p> <p><b>This is in the CTR – and also in the SWNA Agreement – but not in the PUD application.</b></p>	<p>The Applicant is committed to this measure. It will be included as a condition of the Zoning Order.</p>
<p><i>“Parking management plan” (p. 15)</i></p> <p><b>The CTR does not include a provision for any day-to-day visitor parking at the site or how this will be handles. In a building with 80 office employees and 100 housing units, it’s hard to imagine there won’t be a lot of visitors, many arriving by car.</b></p>	<p>Visitor parking is detailed previously in this document, including a detailed description of STC uses outside of daily employees and their estimated parking demand/parking management.</p> <p>Given the site’s proximity to Metrorail and a well-connected pedestrian and bicycle facility network, it is expected that the majority of residential visitors will access the site via non-auto modes of transportation.</p>
<p><i>“A loading facility manager will be designated by property management. The loading facility manager will schedule deliveries.... Trucks using the loading facility will not be allowed to idle...” (p. 15)</i></p> <p><b>Neither the PUD nor the CTR indicates or pledges that the loading facility manager will be on site. If not, how will all these provisions be enforced on a day-to-day basis?</b></p>	<p>The building engineer will be designated as the loading facility manager and will be on-site from 8:00 am to 5:00 pm.</p>
<p><i>“Parking occupancy” (Figures 7-10 on pp. 21-24). The charts claim that parking on the west side of 6<sup>th</sup> Street between G Street and I Street is as low as 25-50%.</i></p> <p><b>Anyone who lives in the neighborhood knows there is far less parking available on these blocks than claimed in the CTR. It’s usually impossible to find a single open space. The discrepancy is probably because the CTR figures are based</b></p>	<p>The collection of parking data on a street cleaning day was an oversight on our part. We are in the process of collecting new parking data and will share the findings of that data prior to the Zoning Commission hearing.</p>

<p><b>on surveys taken on Thursdays, which is a street sweeping day for those blocks.</b></p>	
<p><i>“Future areas of concern for roadway capacity, are primarily focused along commuter routes such as I Street.” (p. 29)</i></p> <p><b>The CTR states that I Street capacity is a future area of concern, but does not address how this will be managed.</b></p>	<p>The main purpose of a CTR is to determine the incremental impact of a proposed development. While the CTR identifies areas where poor LOS is observed with and without the project, the Applicant is only tasked with mitigating direct impacts of the development. DDOT sets specific thresholds for when mitigation measures are triggered in their CTR guidelines, and as discussed in the CTR, only one intersection meets these thresholds.</p>
<p><i>“The intersection of G Street and 4<sup>th</sup> Street met the thresholds for requiring mitigations as a result of the proposed development.” (p. 29)</i></p> <p><b>The CTR assumes but does not give assurances that DDOT has agreed to its proposed mitigation. Moreover, Table 13 (p. 51) seems to show that this intersection will get an “F”, or “unacceptable”, score even with mitigations.</b></p>	<p>DDOT is still in the process of reviewing the CTR and has not had a chance to opine on the proposed mitigations. The DDOT staff report will include a review of our proposed mitigations and will include additional or alternative recommendations if they feel it is appropriate.</p> <p>Table 13 shows that the eastbound approach of G Street and 4<sup>th</sup> Street operates at LOS E under the mitigated scenario. This is actually an improvement over existing conditions which shows the approach operating at LOS F.</p>
<p><i>“Intersection capacity analysis and queuing analysis” (pp. 32-33) “LOS D is typically used as the acceptable LOS threshold in the District.” (p. 32)</i></p> <p><b>After making this statement, the CTR lists five nearby intersections that “operate” under unacceptable conditions during one or more peak hour” and five that “have one or more lane group that exceeds the given storage length during at least one peak hour.” Table 11 (pp. 44-45) lists give nearby intersections with a LOS score of E or F. Table 12 (pp. 46-47) seems to list five intersections that have queuing problems.</b></p>	<p>The complete sentence from page 32 of the CTR states that “LOS D is typically used as the acceptable LOS threshold in the District; although LOS E or F is sometimes accepted in urbanized areas if vehicular improvements would be a detriment to safety or non-auto modes of transportation.” In many of these cases, the way to alleviate vehicular delay is to add turn lanes or remove crosswalks. Both of these options result in detrimental impacts to non-auto modes of transportation which is why signal timing adjustments are proposed as mitigations. LOS is just one way to evaluate the impacts of a development and the CTR determined that impacts to non-auto modes outweighed the improvements to vehicular LOS.</p> <p>Additionally, as stated above, the purpose of the CTR is to determine the incremental impact of the proposed project which is accomplished as part of the proposed mitigations.</p>
<p><i>“A review of pedestrian facilities surrounding the planned development shows that many facilities meet DDOT standards and provide a quality walking environment.” But, “there are some areas which have inadequate sidewalks or</i></p>	<p>Sidewalks surrounding approved or under-construction development projects will be improved including sidewalks surrounding and within Phase 2 of the Wharf, sidewalks along Wesley Place adjacent to 1000 4<sup>th</sup> Street SW, and</p>

<p><i>no sidewalks at all;” and “The sidewalks that do not meet DDOT standards have either unacceptable sidewalk width or unacceptable buffer width. Some of these issues will be remedied as part of this project or other background development;” and “under existing conditions there are some issues with crosswalks and curb ramps near the site.” (p. 56)</i></p> <p><b>The CTR points out problems and says some will be remedied, but does not explain which ones, how, or when they will be remedied. CTR does not say how wide sidewalks will be at the site and whether developers plan to sacrifice city green space (tree strip) for wider sidewalks.</b></p>	<p>sidewalks along M Street adjacent to the Waterfront Station M Street parcels.</p> <p>As it relates to the site, 6<sup>th</sup> Street and I Street sidewalks and streetscapes are proposed to match the existing conditions along those streets. This means I Street will have 6-foot sidewalks with 4-foot tree boxes, and 6<sup>th</sup> Street will have 6-foot sidewalks adjacent to the parking lane with a tree box/landscaping zone between the sidewalk and the face of the building.</p>
<p><i>“Pedestrian facilities.” “The 501 Eye Street SW project will include sidewalks along the perimeter of the site that meet DDOT design requirements. (p. 57)</i></p> <p><b>This suggests that the sidewalks provided will be the absolute minimum required. The pedestrian section of the CTR says nothing about how the increased traffic, cars, and trucks will affect pedestrians or safety, including of children at the school next door to the development.</b></p>	<p>The sidewalks surrounding the site have been designed to meet DDOT standards but also integrate seamlessly with the 6<sup>th</sup> Street and I Street streetscape that exists today. The project is also proposing curb extensions along 6<sup>th</sup> Street to reduce crossing distances and maximize pedestrian queuing space.</p> <p>While the site will generate vehicular activity, the site has been intentionally designed to minimize conflict points.</p>
<p><i>“Bicycle facilities” (p. 60)</i></p> <p><b>The CTR touts dockless bikeshares and scooters as a transportation option for the site, but does not address how the project will handle the problem of dockless bikes and scooters that will be left at the building, blocking sidewalks.</b></p>	<p>There are a handful of paved areas outside of the primary pedestrian pathway that can be used for dockless bikeshare/scooter parking. The plan aims to maximize green space, while maintaining necessary functionality of the space.</p>
<p><i>“16 short-term bicycle racks will be provided around the perimeter of the site on 6<sup>th</sup> Street and Eye Street. The Applicant is willing to work with DDOT to determine the locations of bicycle racks within public space.” (p. 61)</i></p> <p><b>Why does the CTR assume these must be in public space instead of planning to accommodate them within the project? Since the main building would occupy the site up to the property line on I Street, and beyond the property line on 6<sup>th</sup> Street, the only space available on the buildings perimeter would be either on the sidewalks (which already may be the minimum width required) or by further</b></p>	<p>The Project provides 67 long-term bike parking spaces within the Project, which is well in excess of the regulatory requirements and will accommodate residents and STC users. The short-term bicycle parking located outside of the building, which is a requirement of the Zoning Regulations, is meant for visitors and guests. It is standard practice in the District to place short-term bicycle parking in public space so that it can be used not only by residents/visitors of the development itself, but also visitors of residences, retail spaces, etc. outside of the development</p>

<p><b>reducing green space by infringing on the tree strip between the sidewalk and the street.</b></p>	<p>Based on proposed changes to the 6<sup>th</sup> Street streetscape, all short-term bicycle parking is now proposed along I Street or within the driveway near the Annex building. Along I Street, the short-term bicycle parking will be placed in between tree boxes as is common throughout the District. This also allows for a more continuous tree canopy along the 6<sup>th</sup> Street frontage.</p>
<p><i>“Crash data analysis” (p. 63) “According to the Institute of Transportation Engineer’s Transportation Impact Analysis for Site Development, a crash rate of 1.0 or higher is an indication that further study is required. One intersection in this study area met this criterion.”</i></p> <p><b>Table 17 shows two nearby intersections that each had five pedestrian crashes from 2015-2017 (and this was before the greatly increased traffic resulting from the opening of the Wharf and several other new developments in the area). This reinforces our concern about safety and the dangers of increased traffic, especially to children from the neighboring and nearby schools.</b></p>	<p>The data included in the analysis (2015-2017) is the most recent data available from DDOT. Although the CTR includes this crash data, the data is not detailed enough to determine the exact nature of each crash, particularly those involving pedestrians. Additionally, improvements at the intersection of 4<sup>th</sup> &amp; M Street are being studied as part of the 4<sup>th</sup> &amp; M Street SW Safety Study.</p>
<p><i>“The proposed development will directly contribute to the goals of [the Southwest Neighborhood Plan] by providing the community access to the arts.” (p. 6)</i></p> <p><b>There’s nothing in the CTR to justify this statement. The CTR did not study, assess or provide evidence whether the community will have more access to the arts as a result of the project. The CTR makes no reference to all the transportation aspects of how the community would access the site, nor does it provide any estimates of how many community members – if any – would be likely to visit the site.</b></p>	<p>Other elements of the PUD package detail the arts benefits associated with the proposed development.</p>



# TECHNICAL ATTACHMENTS



