

Government of the District of Columbia

Department of Transportation



d. Planning and Sustainability Division

MEMORANDUM

TO: Sara Bardin
Director, Office of Zoning

FROM: Jim Sebastian
Associate Director

DATE: June 10, 2019

SUBJECT: ZC Case No. 19-09 – 1650 Kenilworth Avenue NE (Kenilworth Assisted Living)

PROJECT SUMMARY

Kenilworth Avenue Northbridge, LLC (the “Applicant”) seeks approval of a Voluntary Design Review in order to develop an assisted living facility. The site is located west of Kenilworth Avenue NE, east of National Park Service (NPS) land, south of the Maryland State Line, and north of the Kenilworth Courts PUD (ZC 15-21) in Square 5113 (Lot 806 and Parcel 185/38). The application proposes the following development program:

- 155 assisted living units;
- 26 parking spaces;
- One (1) 30-foot loading berth and one (1) 20-foot delivery space; and
- 51 long- and eight (8) short-term bicycle parking spaces.

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 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 review of the case materials submitted by the Applicant, DDOT finds:

Site Design

- Primary vehicle access is proposed via a two-lane driveway connection to the existing signalized intersection of Eastern Avenue NE and Kenilworth Avenue;
- Secondary access is proposed via a future driveway connection to the public alley network to the south. Since there is a sliver of land between the Applicant's property and the alley, the connection will not be made immediately. In the short term, the driveway will be built to the property line;
- The Kenilworth Courts PUD (ZC 15-21) will widen and extend Shaw Drive in the last phase of the development. The widening of Shaw Drive's right-of-way will allow the Applicant's driveway stub to connect to the street. In the meantime, the Applicant should continue discussions with the owner of the sliver of land between the subject property and Shaw Drive to obtain an easement and expedite the connection;
- The Applicant is meeting all ZR16 loading, bicycle parking, and vehicle parking requirements. DDOT notes that the low vehicle parking ratio (0.17 spaces/unit) is excellent for the site;
- Short-term bicycle racks are currently shown in either the rear of the building or in the parking garage, depending on the graphic. The eight (8) required spaces (4 inverted U-racks) should be installed near the front door;
- The Applicant proposes to provide showers and lockers for employees. It is not clear how many of each is being provided and if it meets ZR16 requirements. The Applicant should clarify; and
- DDOT recommends the Applicant install at least one (1) electric vehicle (EV) charging station and conduit for future EV stations.

Eastern Avenue and Anacostia Avenue NE Extensions

- The Plan of a Permanent System of Highways for the District of Columbia ("DC Highway Plan") calls for the extensions of Eastern Avenue and Anacostia Avenue across the site;
- The Applicant must dedicate the right-of-way necessary to accommodate future Eastern Avenue, if and when the District decides to construct the street;
- The existing segment of Eastern Avenue, east of Kenilworth Avenue, is a four-lane undivided roadway within a 90-foot right-of-way, as measured from the Maryland State Line;
- Given the environmental constraints with developing the site, DDOT finds the Applicant's proposal for an 80-foot right-of-way section of Eastern Avenue west of Kenilworth Avenue acceptable;
- An 80-foot section will still allow DDOT to provide four-lanes of traffic with pedestrian facilities matching the existing section. It also allows for flexibility in the roadway cross-section to accommodate bicycle facilities, fewer travel lanes, and/or additional green space;
- A maximum of 120-feet of right-of-way may be needed close to the intersection with Kenilworth Avenue to straighten out the Eastern Avenue extension since the bridge over the Anacostia Freeway (MD 295) is skewed from the original alignment (see Figure 3 in this report); and
- As part of the on-going Parkside Circulation Study, DDOT is evaluating the feasibility of extending existing Anacostia Avenue along the back side of the site to future Eastern Avenue NE as a way to help relieve traffic congestion in neighborhoods to the south that have limited

connectivity. As such, the Applicant should dedicate any right-of-way necessary, if and when requested by the District to construct the extension.

Travel Assumptions

- The site is located approximately 0.40 mile (walking distance) from the Deanwood Metrorail Station;
- 80 staff members are expected to work at the site with a maximum of 40 staff on the premises at any given time;
- Due to the low parking ratio, low vehicle trip generation (19 trips in the PM), and revised TDM Plan, the impacts of this development on the transportation network are expected to be minimal; and
- The Applicant is proposing to provide a shuttle service for residents to go to doctor's visits, grocery shopping, and off-site activities.

Analysis / Mitigation

- DDOT finds the Applicant's traffic impact analysis of the addition of a new leg to the intersection of Kenilworth Avenue and Eastern Avenue to be acceptable. The Applicant must fund any changes to the existing signal or roadway geometrics at this intersection, subject to DDOT approval; and
- The Transportation Demand Management (TDM) Plan proposed in the May 21, 2019 Comprehensive Transportation Review (CTR) study is mostly acceptable but should be revised with the suggestions proposed by DDOT at the end of this report.

RECOMMENDATION

DDOT has no objection to the approval of the Voluntary Design Review application with the following conditions:

- Fund, design, and construct any new or relocated traffic signal equipment and all required geometric modifications at the intersection of Kenilworth Avenue NE and Eastern Avenue, as required by and subject to approval by DDOT;
- Implement the revised Transportation Demand Management (TDM) plan proposed in the Applicant's May 21, 2019 CTR, for the life of the project, with the minor additions requested by DDOT (see end of this report); and
- Dedicate the right-of-way necessary to accommodate extensions of both Eastern Avenue and Anacostia Avenue through the site, as called for in the Plan of a Permanent System of Highways for the District of Columbia.

CONTINUED COORDINATION

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

- Provide a detailed curbside management and signage plan consistent with current DDOT policies since the signage along Kenilworth Avenue will need to change to accommodate the Applicant's new curb cut;

- Public space, including curb and gutter, street trees and landscaping, street lights, sidewalks, curb ramps, and other features within the public right-of-way are expected to be designed and built to DDOT standards;
- The curb cut to Kenilworth Avenue should be a maximum of 24-feet wide (currently shown as 28-feet), have a maximum of 15-foot curb radii, be at-grade with the existing street, and include pedestrian curb ramps and a crosswalk across the new intersection leg;
- The curb radii for the connection to the alley to the south (Shaw Drive NE) should be reduced from 15-feet to 6-feet;
- Typically, short-term bicycle parking racks are installed in public space. However, given the minimal amount of public space touching the site, the Applicant should install them on private property and follow the design requirements of ZR16 Subtitle C § 804. They should be moved from the garage and rear of the building to near the front door;
- The Applicant participated in a Preliminary Design Review Meeting (PDRM) on June 4, 2019 with the Office of Planning and DDOT to discuss and resolve the public space issues noted above; and
- The Applicant should coordinate with the Ward 7 arborist to determine if there are any Heritage or Special Trees on-site that need to be protected or preserved. If so, it may impact the design of the proposed project.

TRANSPORTATION ANALYSIS

DDOT requires applicants requesting an action from the Zoning Commission complete a Comprehensive Transportation Review (CTR) study to determine the action's impact on the overall transportation network. As such, the Applicant and DDOT coordinated on an agreed-upon scope for a CTR that is consistent with the scale of the action.

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 May 21, 2019 CTR, prepared by Gorove/Slade, 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

Primary vehicular access is proposed via a two-lane driveway that will connect to the existing signalized intersection of Kenilworth Avenue and Eastern Avenue NE forming a new leg. DDOT has reviewed the

traffic impact analysis provided by the Applicant and finds the addition of a new leg to the intersection acceptable so long as the Applicant funds the relocation, modification, or addition of traffic signal equipment and any necessary changes to the intersection geometrics, as required by and approved by DDOT. The Applicant should continue to work with DDOT through the public space permitting process on the final design of the curb cut, striping, and traffic signal changes.

Secondary access will be provided to the south via the future upgraded Shaw Drive NE. The existing public alley network to the south is proposed to be widened and extended as part of the Kenilworth Courts PUD (ZC 15-21). However, in the near-term, the driveway will be built to the property line. The Applicant is proposing sidewalk connections to both Kenilworth Avenue and the alley to the south. Once Shaw Drive is reconstructed and several other new streets are constructed by the Kenilworth Courts PUD, the sidewalk from the Kenilworth Assisted Living property will connect to a new network of sidewalks.

The Applicant is currently beginning the public space permit application process for the curb cut to Kenilworth Avenue NE. A Preliminary Design Review Meeting (PDRM) was held with the Applicant on June 4, 2019 to discuss public space design and changes to the intersection and traffic signal.

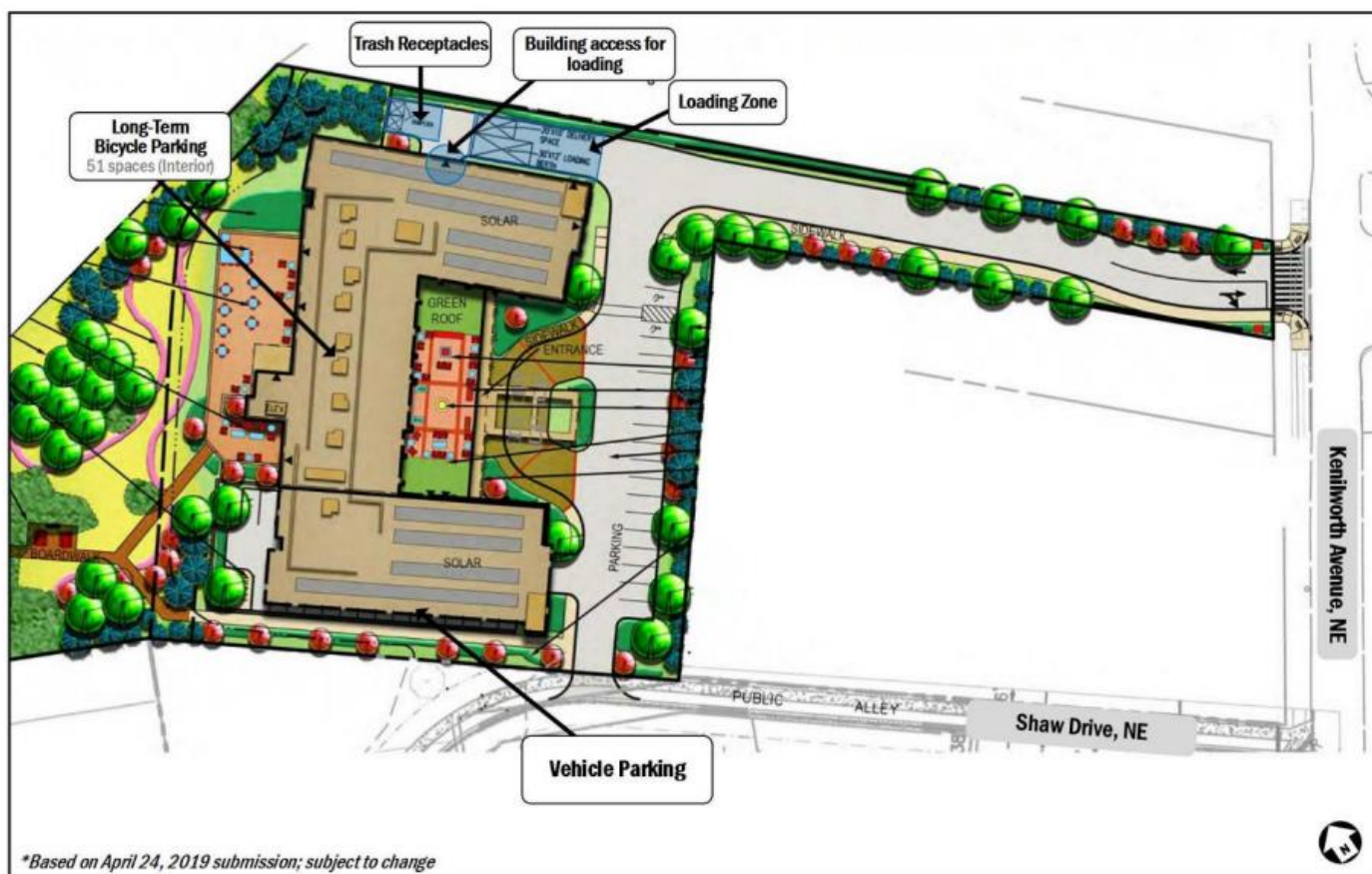


Figure 1 – Site Plan (Source: Grove/Slade, 5/21/19 CTR, Figure 8)

Note: The Applicant is revising the site plan to no longer show the connection to the existing alley in the near-term.

Extension of Eastern Avenue and Anacostia Avenue NE

The site is located adjacent to the future extensions of Eastern Avenue NE and Anacostia Avenue, as called for in the Plan for a Permanent System of Highways for the District of Columbia (“DC Highway Plan”). The MoveDC Mobility Plans also shows the extension of Eastern Avenue from Kenilworth Avenue westward and northward to Bladensburg Road NE. DDOT has no current plans to design or construct either Eastern Avenue or Anacostia Avenue in the near future. However, as part of DDOT’s on-going Parkside Circulation Study, the feasibility of extending Anacostia Avenue to Kenilworth Avenue via future Eastern Avenue is being explored. The proposed assisted living facility should accommodate and not preclude these roadways.

East of Kenilworth Avenue, the existing section of Eastern Avenue is four-lane undivided within a 90-foot right of way, as measured from the Maryland State Line. The Applicant has sufficiently demonstrated a hardship with accommodating 90-feet of right-of-way and has proposed an alternative 80-foot section (see Figure 2 below). Given the environmental constraints with developing the site, DDOT finds the Applicant’s proposal for an 80-foot right-of-way section of Eastern Avenue west of Kenilworth Avenue acceptable. An 80-foot section will still allow DDOT to provide four-lanes of traffic with pedestrian facilities which matches the existing section. It also allows for flexibility in the roadway cross-section to accommodate bicycle facilities, fewer travel lanes, and/or additional green space.

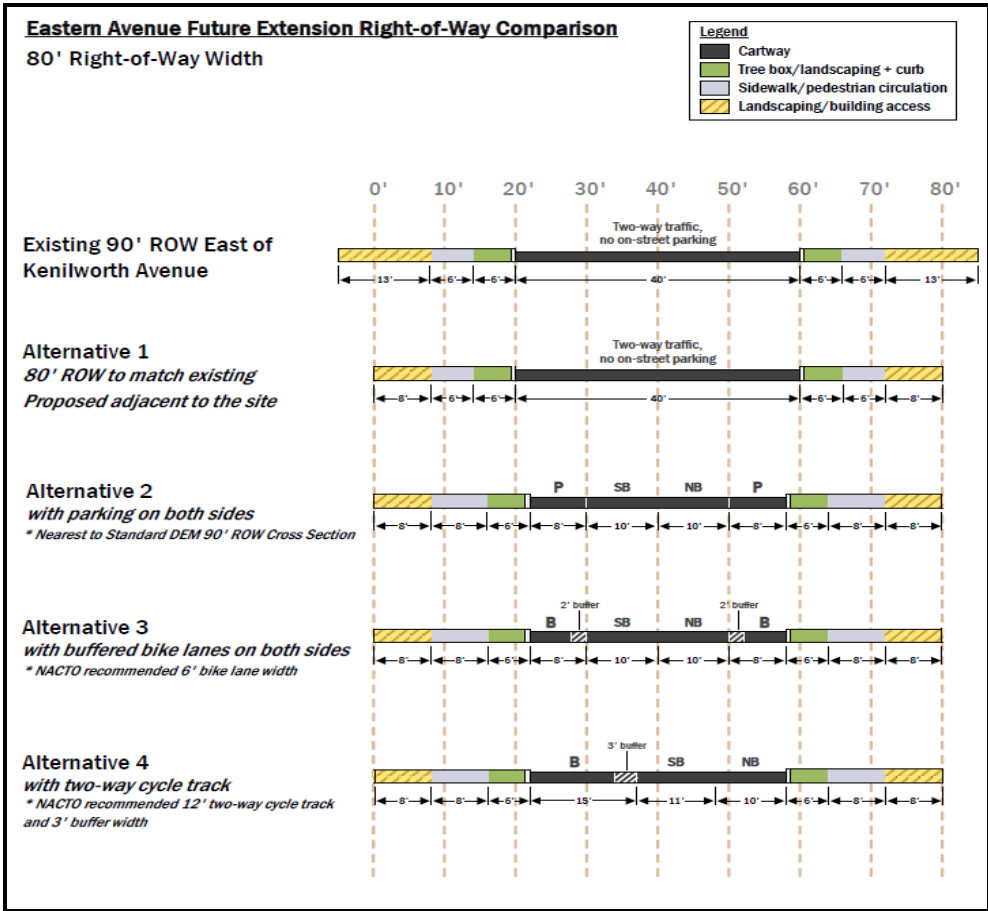


Figure 2 – Eastern Avenue ROW Comparison (Source: Gorove/Slade)

As shown in Figure 3 below, more right-of-way (upwards of 120-feet) will likely be needed closer to the intersection with Kenilworth Avenue to straighten out the Eastern Avenue extension since the bridge over the Anacostia Freeway (MD 295) is skewed from the original alignment.

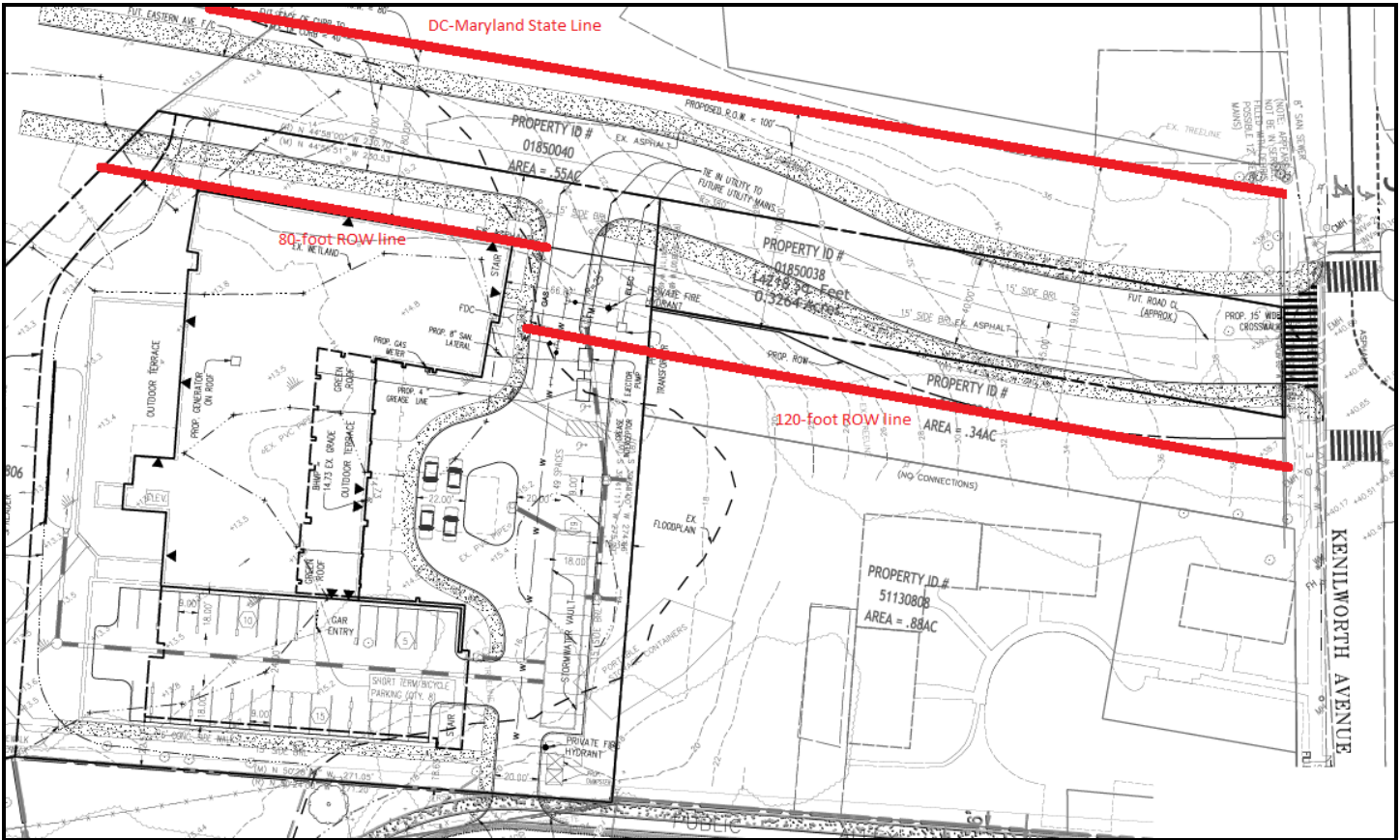


Figure 3 – Eastern Avenue ROW to be Dedicated (Source: Grove/Slade)

The Applicant must commit to dedicating 120 feet of right-of-way near the intersection and 80-feet along the northern side of the assisted living building to accommodate future Eastern Avenue. The dedication must be at no cost to the District and at the time of the District’s choosing. In the meantime, the property will stay under the Applicant’s ownership and no building structures will be allowed to be built in this area. Since there are several other land owners in the vicinity of the site, the Applicant will only be responsible for dedicating the portions of right-of-way that are under their control. The Applicant should also dedicate, at no cost to the District and at the timing of the District’s choosing, any right-of-way necessary along the back side or in the northwest corner of the site that DDOT may need to extend Anacostia Avenue to Kenilworth Avenue.

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.

ZR16 Subtitle C § 901.1 requires this project to provide one (1) 30-foot loading berth with platforms and one (1) 20-foot delivery space. The Applicant is providing both of these berths, however no platforms are included. DDOT has no objection to the exclusion of the platforms since all loading activity can still be provided on private property with only head-in/head-out maneuvers by 40-foot trucks and no trash will be stored or picked-up in public space.

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, landscaping, street lights, sidewalks, and other appropriate features within the public Right-of-Way (ROW) bordering the site.

The Applicant must work closely with DDOT and OP 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 Titles 11, 12A, and 24 of the *District of Columbia's Municipal Regulations (DCMR)*, DDOT's *Design and Engineering Manual (DEM)* and DDOT's *Public Realm Design Manual* will serve as the main references for the Applicant. DDOT staff will be available to provide additional guidance during the Public Space permitting process.

Since the site touches such little public space, DDOT's streetscape and public realm review is limited to mostly to the proposed curb cuts to Kenilworth Avenue and the alley to the south (Shaw Drive):

- The curb cut to Kenilworth Avenue should be a maximum of 24-feet wide (currently shown as 28-feet), have a maximum of 15-foot curb radii, be at-grade with the existing street, and include pedestrian curb ramps and a crosswalk across the new intersection leg;
- The curb radii for the driveway to Shaw Drive NE should be reduced from 15-feet to 6-feet; and
- Typically, short-term bicycle parking racks are installed in public space. However, given the minimal amount of public space touching the site, the Applicant should install them on private property and follow the design requirements of ZR16 Subtitle C § 804. They should be moved from the rear of the building and parking garage to near the front door.

The Applicant recently held a Preliminary Design Review Meeting (PDRM) on June 4, 2019 with the Office of Planning and DDOT to discuss and resolve the public space issues noted above.

Heritage Trees

Heritage Trees are defined as a tree with a circumference of 100 inches or more and are protected by the Tree Canopy Protection Amendment Act of 2016. With approval by the Mayor and DDOT's Urban Forestry Division (UFD), Heritage Trees might be permitted to be relocated. As such, the Applicant may be required to redesign the site plan in order to preserve the Non-Hazardous Heritage Trees. The Applicant should coordinate with the Ward 7 arborist regarding the preservation and protection of any Heritage or Special trees, as well as the planting of new street trees, in bioretention facilities or a typical expanded tree planting space. The presence of any Heritage or Special trees may impact the design of the proposed project.

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.

The Applicant is not currently proposing to install any electric vehicle (EV) charging stations with this development. In keeping with DDOT's recommendation of one (1) electric vehicle charging station per 50 vehicle parking spaces, the Applicant should consider providing at least one (1) station on-site. Electrical conduit should also be installed in the garage which can be used in the future if the Applicant decides to provide more EV charging stations.

Travel Assumptions

The purpose of the Applicant's 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.

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.

The Applicant is proposing to provide a total of 26 vehicle parking spaces. This is the minimum amount of parking required by ZR16 after taking a 50% reduction for being located within ½ mile of the Deanwood Metrorail Station. It is noted that the proposed parking ratio (0.17 spaces per unit) is excellent and is consistent with DDOT's approach to encouraging transit usage, non-automobile ownership lifestyles, and minimizing traffic congestion in the District.

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 developed trip generation assumptions based on the number of staff (40 on-site at any given time), 10% of residents owning a vehicle, and anticipated number of deliveries and emergencies. It was assumed that half of staff will use public transportation and shift changes will be outside of the commuter peak periods. Based on these assumptions, the CTR projected the following breakdown of trips by mode:

Mode	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Auto	9 veh/hr	8 veh/hr	17 veh/hr	12 veh/hr	7 veh/hr	19 veh/hr
Transit	9 ppl/hr	11 ppl/hr	20 ppl/hr	11 ppl/hr	10 ppl/hr	21 ppl/hr
Bike	1 ppl/hr	1 ppl/hr	2 ppl/hr	1 ppl/hr	1 ppl/hr	2 ppl/hr
Walk	2 ppl/hr	3 ppl/hr	5 ppl/hr	4 ppl/hr	3 ppl/hr	7 ppl/hr

Figure 4 – Multi-Modal Trip Generation Summary (Source: Gorove/Slade, 5/21/19 CTR, Table 2)

As shown above, the proposed development is expected to generate a small number of automobile trips (max 19) and transit trips (max 21), as well as a minor number of bicycle and walk trips during the weekday morning and evening commuter peak hours. As such, the impacts to the transportation network are expected to be minimal.

Analysis

To determine the project’s impacts on the transportation network, the Applicant completed a CTR, prepared by Gorove/Slade, dated May 21, 2019, which includes an evaluation of existing transit, pedestrian, and bicycle facilities.

Transit Service

The District and Washington Metropolitan Transportation 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 approximately 0.40 mile from the Deanwood Metrorail Station. Additionally, there is a bus stop located a block from the site at the intersection of Kenilworth Avenue and Shaw Drive. The bus stop is served by the U7 Metrobus route. Other nearby bus stops are served by the R12, V14, and W4 bus routes.

Pedestrian Facilities

The District is committed to enhancing 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.

According to the inventory of pedestrian facilities provided by the Applicant in the May 21, 2019 CTR, the network is almost entirely up to DDOT standards in the vicinity of the site and along walking routes to nearby community amenities, except for the crossing of Shaw Drive on the west side of Kenilworth Avenue NE which is narrower than current DDOT standards. It is noted that this crossing will be widened and upgraded to full ADA accessibility when the Kenilworth Courts PUD reconstructs Shaw Drive and converts it from an alley to a public street.

Bicycle Facilities

The District is committed to enhancing 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. Cycling is expected to be an important mode of transportation for the site, most notably for connecting the site to nearby Metro stations. While the Metro stations are located outside of the typical walkshed of rail transit stations, the distance is ideal for bicycling.

Per ZR16 Subtitle C § 802.1, the Applicant is required to provide 81 long-term and eight (8) short-term bicycle parking spaces. The Applicant proposes to meet the long-term requirement by locating the 51 spaces in a storage room on the first floor of the building. The eight (8) short-term spaces are proposed in the parking garage and rear of the building, depending on graphic in the Applicant's submission. Typically, short-term spaces should be installed in public space, but since this site is far from Kenilworth Avenue, the bicycle racks should be installed on private property and meet the location requirements of ZR16 Subtitle C § 804. Specifically, the eight (8) spaces (4 inverted U-racks) should be located near the front building entrance.

There are currently no bicycle lanes, cycletracks, or trails in the vicinity of the site. There is a 15-dock Capital Bikeshare (CaBi) station located on the opposite side of I-295 at the Deanwood Metrorail Station.

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 this application's approvals:

Transportation Demand Management (TDM)

As part of all major development review cases, DDOT requires the Applicant to produce a comprehensive 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 in the May 21, 2019 CTR to implement the following TDM measures:

- Identify a TDM Leader (for planning, construction, and operations) at the building, who will act as a point of contact with DDOT/Zoning Enforcement with annual updates;
- The TDM Leader will work with residents to distribute and market various transportation alternatives and options;
- Provide TDM materials to new residents in the Residential Welcome Package materials;
- Unbundle the cost of residential parking from the cost of lease or purchase of each unit;
- Meet ZR16 short-term bicycle parking requirement by installing eight (8) spaces along the perimeter of the site; and
- Meet ZR16 long-term bicycle parking requirement by installing 51 internal to the building.

DDOT finds the TDM Plan proposed by the Applicant to be mostly acceptable for the project given the very low parking ratio. However, DDOT requests the following minor additions to the TDM plan:

- Work with DDOT and goDCgo (DDOT's TDM program) to implement TDM measures at the site;
- Share the full contact information of the TDM Leaders for the site with DDOT and goDCgo;
- TDM Leaders will receive training from goDCgo to learn about the TDM conditions for this project and available options for implementing the plan;
- Post all TDM commitments on website, publicize availability, and allow the public to see what commitments have been promised;
- Will provide links to CommuterConnections.com and goDCgo.com on property website;
- Distribute information on the Commuter Connections Guaranteed Ride Home (GRH) program, which provides commuters who regularly carpool, vanpool, bike, walk, or take transit to work with a free and reliable ride home in an emergency;
- Will meet the ZR16 requirements for showers and lockers for use by employees. Applicant should clarify the number that will be provided;
- Provide employees who wish to carpool with detailed carpooling information and will be referred to other carpool matching services sponsored by MWCOG or other comparable service if MWCOG does not offer this service in the future; and
- The TDM Leader will demonstrate to goDCgo that the site is in compliance with the DC Commuter Benefits Law by participating in at least one of the three transportation benefits outlined in the law (employee-paid pre-tax benefit, employer-paid direct benefit, or shuttle service).

JS:az