

# Government of the District of Columbia

## Department of Transportation



### d. Planning and Sustainability Division

#### MEMORANDUM

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

**FROM:** Anna Chamberlin, AICP   
Neighborhood Planning Manager

**DATE:** September 14, 2020

**SUBJECT:** ZC Case No. 20-09 – 2419 25<sup>th</sup> Street SE

---

#### PROJECT SUMMARY

Wagner, LLC (the “Applicant”) has requested approval of a Consolidated Planned Unit Development (PUD) and Related Map Amendment to rezone a 19,601 square-foot (0.45-acre) property from the R-3 Zone to the RA-2 Zone, and develop the site with a 67-unit affordable senior housing residential building, six (6) surface parking spaces, and one (1) 20-foot delivery space. The site is located at 2419 25<sup>th</sup> Street SE and is bounded by 25<sup>th</sup> Street to the east, Wagner Street SE to the north, and the Transitional Care Center rehabilitation center to the south and west. The site is currently vacant.

#### SUMMARY OF DDOT REVIEW

The District Department of Transportation (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 review of the case materials submitted by the Applicant, DDOT finds:

#### Site Design

- Pedestrian access to the building is via two entrances: 1) the main entrance on 25<sup>th</sup> Street SE to the lobby; and 2) at the northern end of the site via a walkway from the surface parking lot;

- Vehicular access to the site is via a 12-foot curb cut on Wagner Street SE that leads to a surface parking lot with six (6) parking spaces and one (1) 20-foot delivery space;
- The proposed six (6) off-street parking spaces meet the ZR16 parking requirements and include one (1) carsharing space;
- DDOT supports the Applicant's request for zoning relief from the required 30-foot loading berth and platform due to site design constraints and intensity of the proposed use;
- The Loading Management Plan (LMP) proposed in the August 10, 2020 Transportation Statement, which restricts trucks larger than 20 feet in length, should be included as a condition to help facilitate the movement of trucks and minimize impacts from the lack of loading berth and platform;
- All loading activities and truck turn arounds are proposed to occur on private property via a curb cut on Wagner Street SE with head-in/head-out movements from the street to a dedicated service/delivery space, consistent with DDOT standards;
- The Applicant proposes to meet the ZR16 minimum requirements of 22 long-term and three (3) short-term bicycle parking spaces; and
- Final locations of the short-term spaces (inverted U-racks) will be determined during public space permitting but should be in easily accessible locations near building entrances.

### **Travel Assumptions**

- The purpose of the Transportation Statement 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.
- The site is expected to have a mode split of 51% automobile and 49% non-auto;
- Based on the assumed mode split, the site is only anticipated to generate 7 AM and 9 PM peak hour vehicle trips. Far below DDOT's trip threshold for further traffic analysis;
- The trips generated by the project are expected to have a minimal impact on the transportation network; and
- The Applicant proposed a sufficiently robust TDM plan in the August 10, 2020 Transportation Statement for the site to minimize auto travel and support non-auto travel needs.

### **Multi-Modal Evaluation**

- The site is approximately 1.1 mile walking distance from the Naylor Road Metrorail station in Maryland. There are two (2) bus stops for local Metrobus routes adjacent to the site;
- The site is well connected to the surrounding neighborhood with a mostly complete pedestrian network, however a sidewalk was shown to be missing along the south side of Wagner Street;
- The Applicant's August 10, 2020 Transportation Statement proposed to construct a sidewalk along the southern side of Wagner Street between 25<sup>th</sup> Street and the first driveway to the west, as well as curb extensions at the intersection of 25<sup>th</sup> Street and Wagner Street. These should be memorialized as conditions of approval.

### **RECOMMENDATION**

DDOT has no objection to approval of the Consolidated Planned Unit Development and Zoning Map Amendment applications with the following conditions:

- As proposed in the Applicant’s August 10, 2020 Transportation Statement (Exhibit 19). Fund and construct pedestrian network improvements in the immediate vicinity of the site to encourage walking. Specifically, construct a sidewalk on the south side of Wagner Street SE from 25<sup>th</sup> Street SE to the nearest single-family residential driveway directly west of the site, and construct curb extensions on Wagner Street SE at the intersection with 25<sup>th</sup> Street to reduce the pedestrian crossing, subject to DDOT approval;
- Implement the Transportation Demand Management (TDM) Plan as proposed in the Applicant’s August 10, 2020 Transportation Statement (Exhibit 19), for the life of the project, unless otherwise noted (the TDM Plan is discussed in greater detail later in this report); and
- Implement the Loading Management Plan (LMP) proposed in the Applicant’s August 10, 2020 Transportation Statement (Exhibit 19), for the life of the project, unless otherwise noted (the LMP is discussed in greater detail later in this report).

### **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:

- Public space, including curb and gutter, street trees and landscaping, streetlights, sidewalks, curb ramps, and other features within the public rights of way, are expected to be designed and built to DDOT standards;
- The Applicant will be required to obtain public space permits for all elements of the project proposed in public space. DDOT has several comments on the Applicant’s initial public space design which are noted later in the Streetscape and Public Realm section and can be resolved during the public space permitting process;
- The Applicant should participate in a Preliminary Design Review Meeting (PDRM) to discuss the public space design with DDOT and OP;
- Submit a detailed curbside management and signage plan to DDOT, consistent with current DDOT policies. If meter installation is required, they will be at the Applicant’s expense;
- Coordinate with DDOT’s Active Transportation Branch, Neighborhood Planning Branch, and TOSD regarding design and implementation of the pedestrian network improvements; and
- Coordinate with DDOT’s Urban Forestry Division (UFD) and the Ward 8 arborist regarding the preservation and protection of existing small street trees, as well as the planting of new street trees, in bioretention facilities or a typical expanded tree planting space.

### **TRANSPORTATION ANALYSIS**

DDOT requires applicants requesting an action from the Zoning Commission complete a Transportation Statement in order to determine the action’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 Transportation Statement should be performed according to DDOT

direction. The Applicant and DDOT coordinated on an agreed-upon scope for the Transportation Statement that is consistent with the scale of the action.

The review of the analysis is divided into three categories: site design, travel assumptions, and multi-modal evaluation. The following review provided by DDOT evaluates the Applicant's Transportation Statement 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, vehicle parking, 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

Pedestrian access to the main building is via two entrances: 1) the main entrance on 25<sup>th</sup> Street SE to the lobby; and 2) at the northern end of the site via a walkway from the surface parking lot. Vehicular access to the site is via a 12-foot curb cut on Wagner Street SE that leads to a surface parking lot with six (6) parking spaces and one (1) 20-foot delivery space. The driveway accommodates two-way traffic and is consistent with standards established in DDOT's *Design and Engineering Manual* for residential curb cuts. Figure 1 below shows the site layout of the proposed project.

**Figure 1 | Site Plan**



(Source: Architectural Drawings – Part 2, Exhibit 3C2)

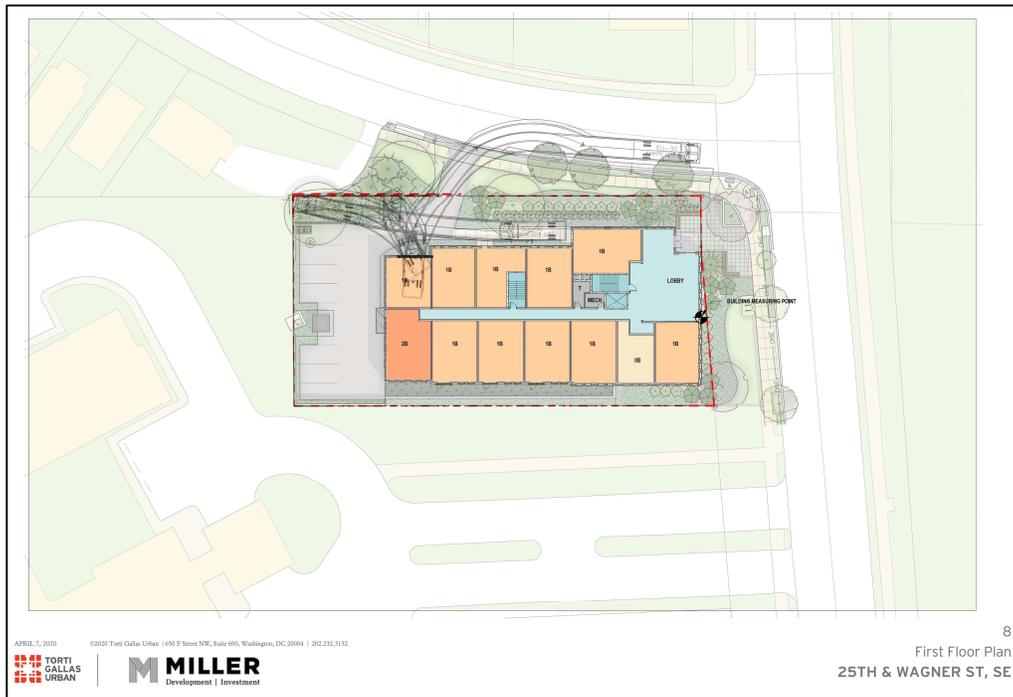
Loading

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.

Per Subtitle C § 901.1 and § 901.4 of the 2016 Zoning Regulations (ZR16), residential properties with more than 50 units are required to provide one (1) loading berth, one (1) loading platform, and one (1) 20-foot delivery space. The Applicant proposes to provide one (1) 20-foot delivery space in the surface parking lot, but requests zoning relief from the required loading berth and platform.

The site design allows for truck deliveries to take place in the service/delivery space at the northern end of the surface parking lot. The truck turning diagrams included in the August 10, 2020 Transportation Statement demonstrate that 20-foot trucks can enter and exit the service/delivery space with head-in and head-out movements. The site design, however, provides significant constraints for a 30-foot truck, as shown by Figure 2 below. If the Applicant were to provide a 30-foot loading berth and platform as required by ZR16, the proposed development would lose approximately five (5) affordable senior housing units to provide adequate space for the truck turning maneuvers and would require additional pavement resulting in a loss of green space, trees, and landscaping. The truck maneuverings below also show impacts beyond the extents of the property line and would require a wider curb cut than DDOT would support for the scale of the development project.

**Figure 2 | Impacts to Site if 30-Foot Berth Zoning Requirement Met**



(Source: Symmetra Design email to DDOT staff, 7/21/2020)

Given the proposed senior housing use, the size and mix of units, and the negative impacts to site design, staff supports the proposed relief from the 30-foot loading berth and platform and believes that the proposed service/delivery space will be able to accommodate move-ins/move-outs. As for trash, the trash room is in the cellar/basement of the building and will be rolled down the driveway for pickup on Wagner Street.

To help facilitate truck movement and manage conflicts with vehicles and pedestrians within the alley network, the Applicant has proposed the following Loading Management Plan (LMP) in the August 10, 2020 Transportation Statement for the project:

- The property manager will be responsible for coordinating with tenants to schedule deliveries and move-ins/move-outs and will work with the community and neighbors to resolve any conflicts should they arise.
- A lease provision will require all tenants to use only the service delivery space for all deliveries and move-in and moveout activities.
- The maximum size for on-site delivery vehicles is 20 feet in length.
- Residents utilizing moving trucks greater than 20 feet in length shall be required to obtain “Emergency, No Parking” signs for Wagner Street SE during the duration of the move. The fees for this service will be paid by the resident. The property manager will schedule move-ins/moveouts using the service delivery space such that the loading capacity is not exceeded.
- In the event that an unscheduled delivery vehicle arrives while the dock is full, that driver will be directed to return at a later time when the service space will be available so as to not compromise safety or impede operations on Wagner Street SE or 25th Street SE.

- Trash/recycle will be stored in the building, and then rolled out from the trash room to be collected on Wagner Street.

DDOT concurs with the proposed LMP above and has no objection to the site's loading scheme. The LMP should be included in the final Zoning Order.

#### 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 of ZR16 requires senior housing projects to provide one (1) off-street vehicle parking space per six (6) dwelling units. The subject site is eligible for a 50 percent reduction because the site is within a ¼-mile of a Priority Corridor Network Metrobus Route, resulting in a parking requirement of six (6) parking spaces. The Applicant proposes to provide six (6) vehicle parking spaces, including one (1) carshare space (3 space credit), thereby meeting ZR16 parking requirements. The proposed number of parking spaces is meets DDOT's preferred maximum parking rates published in the June 2019 *Guidance for Comprehensive Transportation Review*, which encourages a maximum of 0.40 spaces/unit parking ratio, or 27 parking spaces for the proposed development.

Since the site has an excellent (low) parking ratio, is located within a ¼-mile of a Priority Network Corridor Metrobus Route, the projected vehicle trip generation was low, and the Applicant has committed to a robust Transportation Demand Management (TDM) plan (see later in this report), DDOT did not require a Comprehensive Transportation Review (CTR) study or Traffic Impact Analysis (TIA).

#### Bicycle Parking

The District is committed to enhancing bicycle access by ensuring consistent investment in bicycle infrastructure by both the public and private sectors. DDOT expects new developments to serve the needs of all trips they generate, including bicycling trips.

Per ZR16 Subtitle C § 802.1, the Applicant is required to provide 22 long-term and three (3) short-term bicycle parking spaces. The Applicant is proposing to meet these requirements by installing 22 long-term spaces within the cellar of the building and three (3) short-term spaces within public space near the entrance to the lobby on 25<sup>th</sup> Street SE. The final locations of short-term bicycle parking will be determined during public space permitting but should be of an inverted U-rack design and located near building entrances.

#### 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, streetlights, 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 (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 DCMR, DDOT's most recent version of the *Design and Engineering Manual (DEM)* and the *Public Realm Design Manual* will serve as the main public realm references for the Applicant. Public space designs will be reviewed in further detail during the public space permitting process. DDOT staff will be available to provide additional guidance during these processes.

While the preliminary public space plans, shown above in Figure 1, are generally consistent with DDOT standards, there are several considerations that need to be reviewed in greater detail during the public space permitting process:

- The Applicant proposes to install a sidewalk on the south side of Wagner Street SE from 25<sup>th</sup> Street SE to the first residential driveway west of the subject site. DDOT supports this expansion of the pedestrian network;
- The Applicant proposes in the Transportation Statement to install curb extensions on Wagner Street SE, at 25<sup>th</sup> Street SE to shorten the crossing distance and improve pedestrian safety. The Applicant should coordinate with the Neighborhood Planning Branch to determine if the extension should be considered for the Arts in the Right-of-Way (AROW) program;
- Approval from the Public Space Committee is needed for the proposed curb cut on Wagner Street SE. Due to the lack of alley access, DDOT supports the proposed curb cut given the low projected traffic volumes so long as the width does not exceed 12 feet;
- Balcony projections on 25<sup>th</sup> Street SE should not project more than four (4) feet into public space; and
- The final location of short-term bicycle racks on 25<sup>th</sup> Street SE will need to be confirmed that they are within 120 feet of the primary entrance.

#### Sustainable Transportation Elements

Sustainable transportation measures 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. As mentioned in the Vehicle Parking section, the Applicant proposes one off-street vehicle parking space to be reserved for carsharing services. The Applicant is not proposing any electric vehicle charging stations. DDOT typically recommends one (1) be installed for every 50 parking spaces.

## Travel Assumptions

### Mode Split and 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 study assumed a 51% automobile and 49% non-automobile mode split for the project, based on a variety of sources (including the National Household Travel Survey). Trip generation estimates were developed using the rates published in the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 10<sup>th</sup> Edition* (Land Use Code 252 Senior Housing) 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. Based on the ITE trip generation rates and split assumptions, Figure 3 shows the predicted number of weekday peak hour trips generated by each mode.

**Figure 3 | Trip Generation Analysis**

|                   |  | AM Peak  |          |          | PM Peak  |          |          |
|-------------------|--|----------|----------|----------|----------|----------|----------|
|                   |  | IN       | OUT      | TOTAL    | IN       | OUT      | TOTAL    |
| Auto Person Trips |  | 3        | 5        | 8        | 6        | 5        | 11       |
| <b>Auto Trips</b> |  | <b>2</b> | <b>4</b> | <b>7</b> | <b>5</b> | <b>4</b> | <b>9</b> |

(Source: Symmetra Design Transportation Statement – Table 4, 8/10/20)

As shown above, the amount of vehicle trips generated are expected to be minimal during the weekday commuter peak hours. Due to the low number of trips generated, low parking ratio, and proposed TDM plan, DDOT did not require further traffic analysis.

### Transportation Demand Management (TDM)

As part of all land development 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 a TDM Plan in the August 10, 2020 Transportation Statement which includes the following elements:

- Identify Transportation Coordinator for the planning, construction, and operations phases of development. The Transportation Coordinator 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 Coordinator 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 communications.
- Transportation Coordinator 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), carpool and vanpool information, CaBi coupon or rack card, 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](mailto: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 (MWCOG) or other comparable service if MWCOG does not offer this in the future.
- Transportation Coordinator will subscribe to goDCgo's residential newsletter.
- Post all TDM commitments on website, publicize availability, and allow the public to see what commitments have been promised.
- Provide a FREE SmarTrip card to every new resident and a complimentary Capital Bikeshare coupon good for one ride.
- Will meet ZR16 short- and long-term bicycle parking requirements. Long-term bicycle space will be provided free of charge to residents. (22 long-term spaces provided)
- Following the issuance of a certificate of occupancy for the Project, the Transportation Coordinator shall submit documentation from DCRA summarizing compliance with the transportation and TDM conditions of the Order (including, if made available, any written confirmation from the Office of the Zoning Administrator) to the Office of Zoning for inclusion in the IZIS case record of the case; and
- Following the issuance of a certificate of occupancy for the Project, the Transportation Coordinator will submit a letter to the Zoning Administrator, DDOT, and goDCgo every five (5)

years (as measured from the final certificate of occupancy for the Project) summarizing continued compliance with the transportation and TDM conditions in the Order.

DDOT finds the proposed TDM plan to be sufficiently robust to support the non-automatic travel needs of the residents.

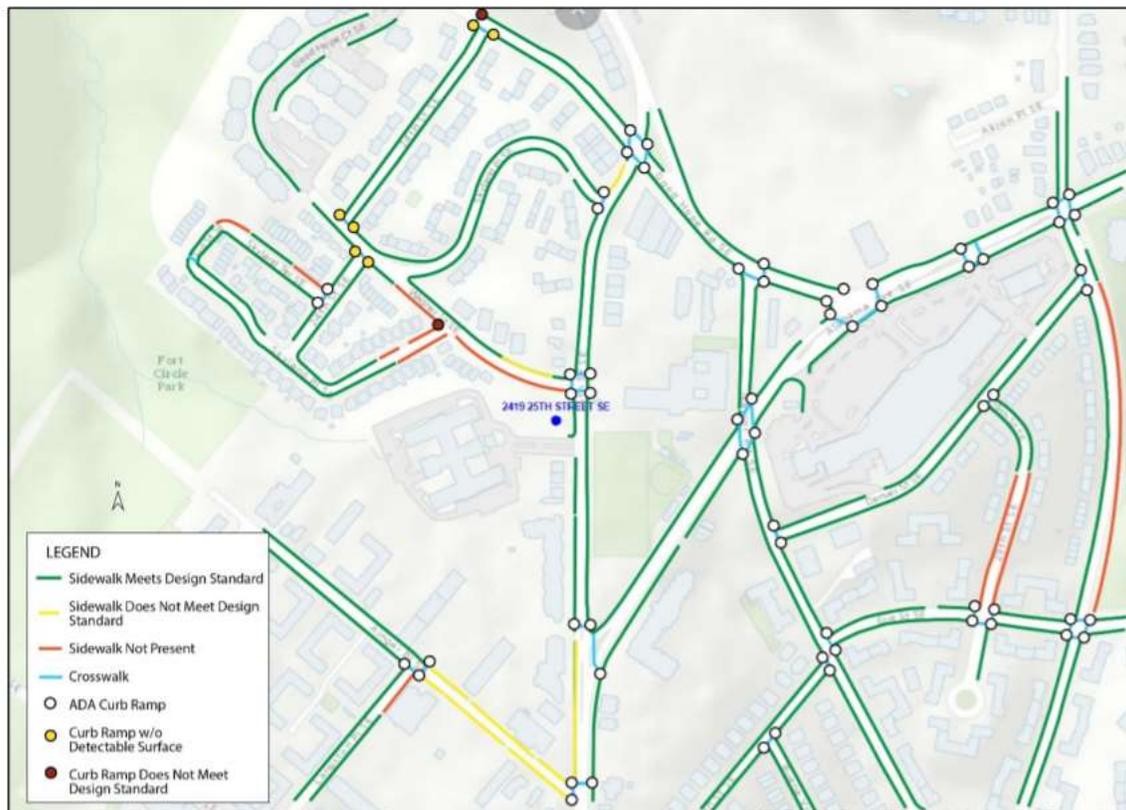
## Multi-Modal Network Evaluation

### Pedestrian Network

The District is committed to enhancing 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. DDOT expects that the Applicant will reconstruct the public space along the frontage on both Wagner Street and 25<sup>th</sup> Street SE and upgrade any pedestrian facilities to current DDOT standards.

The Applicant’s inventory of existing pedestrian infrastructure, as shown in Figure 4 below, demonstrates that most sidewalks in the immediate vicinity of the site are currently constructed with appropriate widths and include accessible curb ramps, excluding Wagner Street which is directly adjacent to the subject site.

**Figure 4 | Existing Pedestrian Network**



(Source: Symmetra Design Transportation Statement, Figure 3, 8/10/2020)

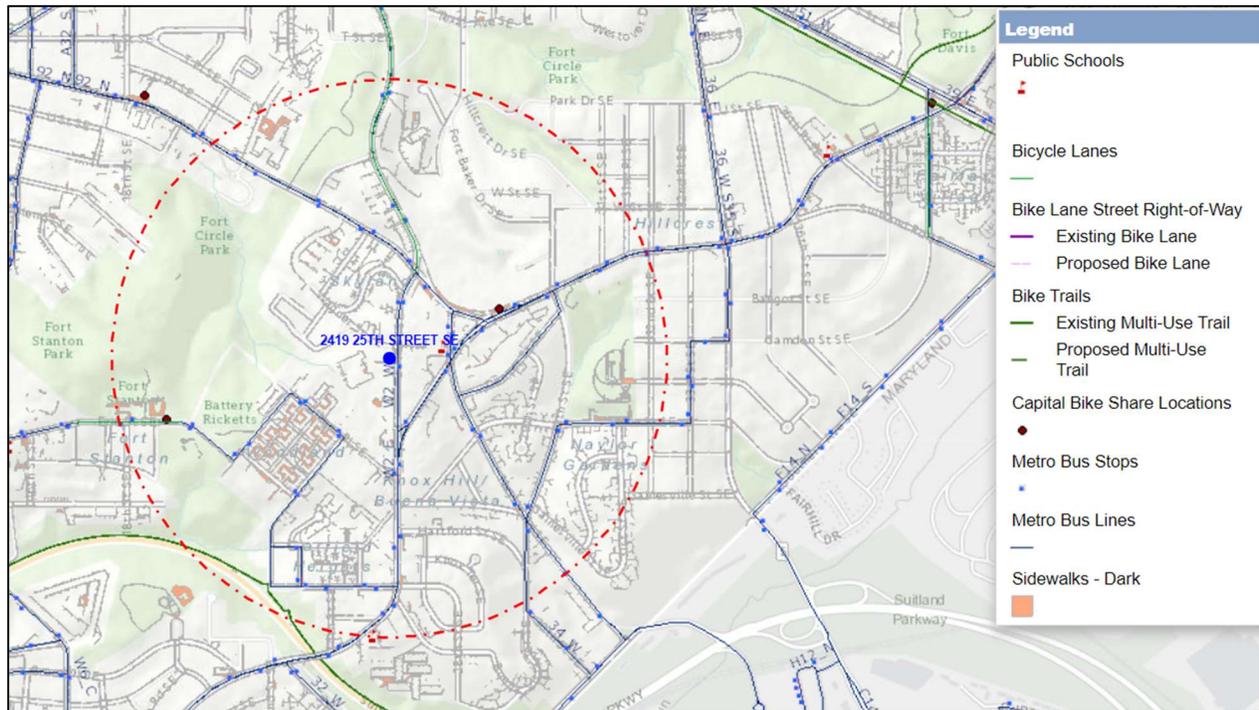
To increase pedestrian connectivity and safety in this area, the Applicant has agreed to fund and construct a DDOT-standard sidewalk on Wagner Street SE from 25<sup>th</sup> Street SE to the adjacent single-family property directly west of the subject site, as well as a curb extension on Wagner Street SE at the intersection of 25<sup>th</sup> Street SE. The curb extension will make the stop signs more visible to drivers, shorten the crossing distance for pedestrians, and slow turning vehicles.

**Bicycle Network**

The District is committed to enhancing bicycle accessibility 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. Bicycling is expected to be an important mode of transportation for this development.

As shown below in Figure 5, there are two (2) Capital Bikeshare stations and no paved bicycle lanes on the roadway network within a half-mile radius of the site. There is a shared-use lane, however, for bicycle and vehicles on 25<sup>th</sup> Street SE north of Good Hope Road SE.

**Figure 5 | Existing Bicycle Facilities**



(Source: Symmetra Design Transportation Statement, Figure 10, 8/10/2020)

**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 approximately 1.1-mile walking distance, roughly a 15- to 20- minute walk, from the Naylor Road Metrorail station which is served by the Green Line. There are two bus stops for the Route W2 bus route adjacent to the subject site. There are several Priority Corridor Network Metrobus Routes located on Good Hope Road and Naylor Road approximately ¼ mile away.

AC:kv