

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 
Neighborhood Planning Manager

DATE: May 7, 2021

SUBJECT: ZC Case No. 20-27 – 7th and P Street NW

PROJECT SUMMARY

High Street District Development, Inc. (the “Applicant”) has requested approval of a Consolidated Planned Unit Development (PUD) application and related zoning map amendment to redevelop a property bounded by 7th Street NW, P Street NW, Marion Street NW, and Marion Court NW. The site currently contains a single-story retail building and surface parking lot. The proposal to construct a mixed-use development includes the following development program:

- 223 residential units;
- 7,742 square-foot ground-floor retail;
- 56 on-site vehicle parking spaces;
- 72 long-term and 14 short-term bicycle parking spaces; and
- One (1) 30-foot loading berth and one (1) 20-foot delivery space.

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:

- Vehicular access to the site is proposed via the rear alley network and all existing curb cuts to the site will be closed;
- Of the 56 vehicle parking spaces proposed, 40 spaces are required for the mixed-use residential building per the 2016 Zoning Regulations (ZR16) and two (2) electric vehicle charging stations will be provided;
- The project is meeting the ZR16 requirements for loading berths and delivery spaces by providing (1) 30-foot berth and (1) 20-foot delivery space. All loading activities are proposed to occur on private property via the rear alley network with head-in/head-out movements from the alley to public streets;
- The Applicant proposes to exceed the ZR16 minimum requirements of 63 long-term and 12 short-term bicycle parking spaces by providing 72 long- and 14 short-term spaces;
- The Applicant utilized sound methodology and assumptions to perform the analysis in the Transportation Statement;
- The proposed development is projected to generate 26 vehicle trips during the morning peak hour and 33 vehicle trips in the afternoon peak hour, which does not meet the threshold to trigger a Comprehensive Transportation Review (CTR) and traffic impact analysis (TIA); and
- The Transportation Demand Management (TDM) plan proposed in the March 26, 2021 Transportation Statement (Exhibit 25A) is sufficiently robust to encourage non-auto travel.

RECOMMENDATION

DDOT has no objection to approval of this Consolidated Planned Unit Development application with the following condition:

- Implement the Transportation Demand Management (TDM) Plan as proposed in the Applicant's March 26, 2021 Transportation Statement (Exhibit 25A), for the life of the project, unless otherwise noted (the TDM Plan 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, street lights, 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;
- 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 Urban Forestry Division (UFD) and the Ward 2 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 four categories: site design, travel assumptions, multi-modal evaluation, and mitigations. 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.

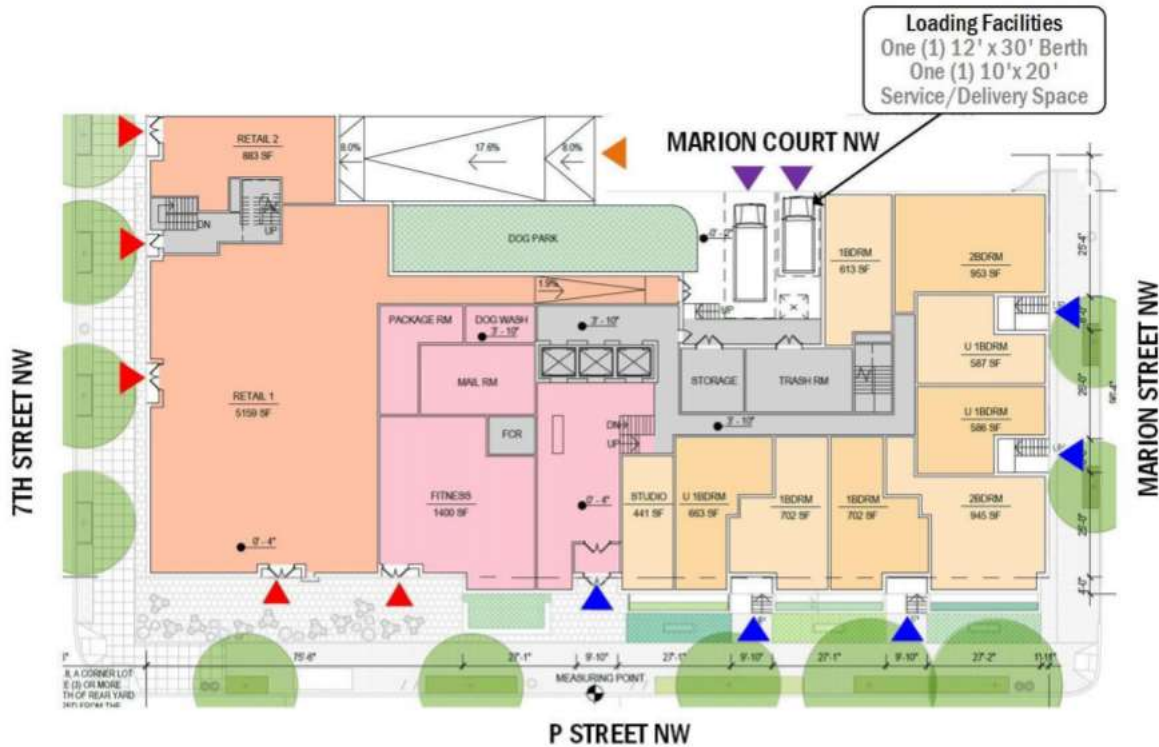
Site Access

Pedestrian access to the main building is via three (3) entrances on 7th Street NW (for access to the ground-floor retail), five (5) entrances on P Street NW (two for access to retail and three for access to residential uses), and two (2) entrances on Marion Street NW for access to residential uses.

Vehicular access to the below-grade parking garage is proposed via a two-way entrance/exit from the 11.5-foot public alley within the existing alley network. The alley serving the rear of the site connect to Marion Street NW at two (2) locations. The loading dock area is also accessed via the public alley. The proposed access to both parking and loading meets DDOT's standard that all vehicular access be provided via the alley network when available.

The project proposes no new curb cuts to the public street network and instead will be closing the existing curb cut on P Street, consistent with DDOT standards for minimizing curb cuts. Figure 1 below shows the site layout of the proposed project.

Figure 1 | Site Plan (Source: Gorove Slade 3/26/21 Transportation Statement, Figure 4)



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. For the retail component of this project, zoning requires one (1) loading berth, one (1) loading platform, and zero (0) delivery spaces. The Applicant is proposing to meet the ZR16 requirements and practical needs for loading by providing one (1) 30-foot berth, one (1) 20-foot delivery spaces, and a loading platform. Per Subtitle C §901.8, additional loading berths are not required since two (2) or more uses that share a building or structure may share loading as long as internal access is provided from all shared uses requiring loading.

The building is designed so that all loading activities take place in the dock area off of the rear alley. The truck turning diagrams included in the March 26, 2021 CTR demonstrate that 30-foot trucks can enter and exit the alley network with head-in and head-out movements, consistent with DDOT standards. Trucks are able to maneuver and turn around while in the alley network and loading dock area, so that they can exit to the designated “truck through route” on 7th Street NW, via the short segment of P Street. The loading facilities will also be used for trash pick-up, mail drop-off, retail deliveries, and move-ins/outs by residents.

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.

Per Subtitle C §701.5 of ZR16, the proposed mixed-use development is required to have 40 off-street vehicle parking spaces after taking the allowable 50% reduction (§702.1 of ZR16) for being within a half-mile of the Shaw-Howard University Metrorail and Mt. Vernon Square/7th Street-Convention Center Metrorail stations. The Applicant proposes 56 off-street vehicle parking spaces, which is 16 spaces more than what is required by zoning. The parking ratio of 0.25 spaces/unit is excellent (low) and consistent with DDOT's preferred maximum parking rates per the June 2019 *Guidance for Comprehensive Transportation Review*.

Bicycle Parking

Per ZR16 Subtitle C §802.1, the Applicant is required to provide 63 long-term and 13 short-term bicycle parking spaces. The Applicant is proposing to exceed these requirements by installing 72 long-term spaces in the parking garage and 14 short-term spaces around the perimeter of the site in public space. Short-term spaces should be accommodated by installing inverted U-racks in public space or on private property. The final locations of short-term bicycle parking will be determined during public space permitting.

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 (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. Staff notes that the Applicant participated in a Preliminary Design Review Meeting (PDRM) to on August 25, 2020 to review the proposed public space plan.

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

- DDOT concurs that the existing curb cut on P Street NW should be closed and replaced with green space and street trees;
- Bay windows on P Street NW should not project more than 4-feet into public space;
- Lead walks should not exceed six (6) feet in width within public space; and
- Steps should not project more than 10 feet into public space from the property line.

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.

The Applicant is proposing to provide two (2) electric vehicle (EV) charging stations in the parking garage, which is consistent with DDOT's recommendation to install at least one (1) EV station for every 50 vehicle parking spaces.

DDOT encourages the Applicant to provide a minimum of 1 EV space for every 50 spaces (approximately 1 for this building). It is noted that a new District law, the Electric Vehicle Readiness Amendment Act of 2020, calls for 20% of all new off-street parking spaces to be EV-ready starting January 1, 2022. At this time, the law has not gone into effect because it has not been funded. The Applicant should be aware that this requirement may go into effect prior to pulling their building permit.

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. Special Trees are defined as being between 44 inches and 99.99 inches in circumference. Special trees may be removed with a permit. However, if a Special Tree is designated to remain by UFD, protection is necessary.

UFD noted in their April 12, 2021 report that there are zero (0) Heritage and two (2) Special Trees located on-site. It is recommended that the Applicant coordinate with the Ward 2 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.

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 understanding who is traveling to the site, from where, and by which modes.

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 Applicant provided trip generation estimates which utilized the rates published in the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 10th Edition* (Land Use Code 221 Multi-Family Mid-Rise and Code 820 Shopping Center) 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.

Mode split assumptions used in the subject analysis were informed by the Census. Figure 2 below shows the mode splits assumed for the traffic impact analysis within the Transportation Statement.

Figure 2 | Summary of Mode Split Assumptions (Source: Gorove Slade 3/26/21 Transportation Statement, Table 4)

Land Use	Mode			
	Drive	Transit	Bike	Walk
Residential	30%	45%	10%	15%
Retail	5%	5%	10%	80%

Based on the ITE trip generation rates and mode split assumptions, Figure 3 shows the predicted number of weekday and Saturday peak hour trips generated by each mode.

Figure 3 | Multi-Modal Trip Generation Summary (Source: Gorove Slade 3/26/21 Transportation Statement, Table 5)

Mode	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Residential (223 Units)						
<i>Auto</i>	7 veh/hr	17 veh/hr	24 veh/hr	18 veh/hr	12 veh/hr	30 veh/hr
<i>Transit</i>	11 ppl/hr	31 ppl/hr	42 ppl/hr	32 ppl/hr	20 ppl/hr	52 ppl/hr
<i>Bike</i>	3 ppl/hr	6 ppl/hr	9 ppl/hr	7 ppl/hr	5 ppl/hr	12 ppl/hr
<i>Walk</i>	4 ppl/hr	10 ppl/hr	14 ppl/hr	11 ppl/hr	6 ppl/hr	17 ppl/hr
Retail (7,442 SF)						
<i>Auto</i>	0 veh/hr	1 veh/hr	1 veh/hr	1 veh/hr	1 veh/hr	2 veh/hr
<i>Transit</i>	0 ppl/hr	1 ppl/hr	1 ppl/hr	1 ppl/hr	2 ppl/hr	3 ppl/hr
<i>Bike</i>	1 ppl/hr	0 ppl/hr	1 ppl/hr	2 ppl/hr	3 ppl/hr	5 ppl/hr
<i>Walk</i>	6 ppl/hr	4 ppl/hr	10 ppl/hr	19 ppl/hr	22 ppl/hr	41 ppl/hr
Total						
<i>Auto</i>	7 veh/hr	18 veh/hr	25 veh/hr	19 veh/hr	13 veh/hr	32 veh/hr
<i>Transit</i>	11 ppl/hr	32 ppl/hr	43 ppl/hr	33 ppl/hr	22 ppl/hr	55 ppl/hr
<i>Bike</i>	4 ppl/hr	6 ppl/hr	10 ppl/hr	9 ppl/hr	8 ppl/hr	17 ppl/hr
<i>Walk</i>	10 ppl/hr	14 ppl/hr	24 ppl/hr	30 ppl/hr	28 ppl/hr	58 ppl/hr

The proposed project is expected to generate approximately 25 vehicular trips during the morning peak hour (7 inbound, 18 outbound) and 32 vehicular trips during the afternoon peak hour (19 inbound, 13 outbound). Per the DDOT guidelines, a traffic impact analysis (TIA) was not required because the number of net new trips in either peak direction does not exceed 25 vehicle trips.

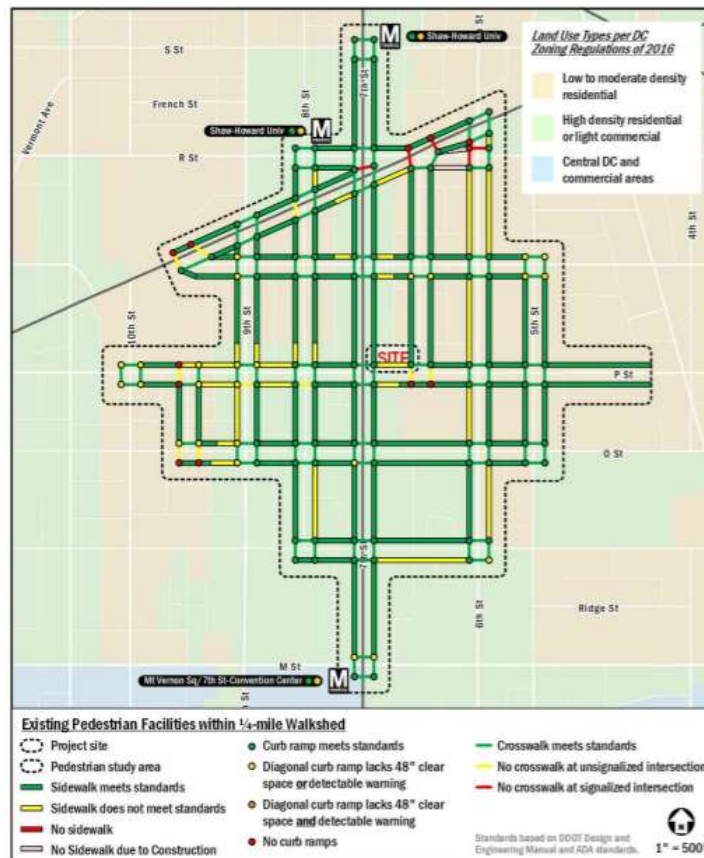
Multi-Modal Network Evaluation

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 7th Street NW, P Street NW, and Marion Street NW, 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. While there are a number of missing or substandard facilities in the broader area, the existing pedestrian network along major walking routes from the site to schools, attractions, and the Metrorail station is generally adequate.

Figure 4 | Existing Pedestrian Network (Source: Gorove Slade 3/26/21 Transportation Statement, Figure 5)



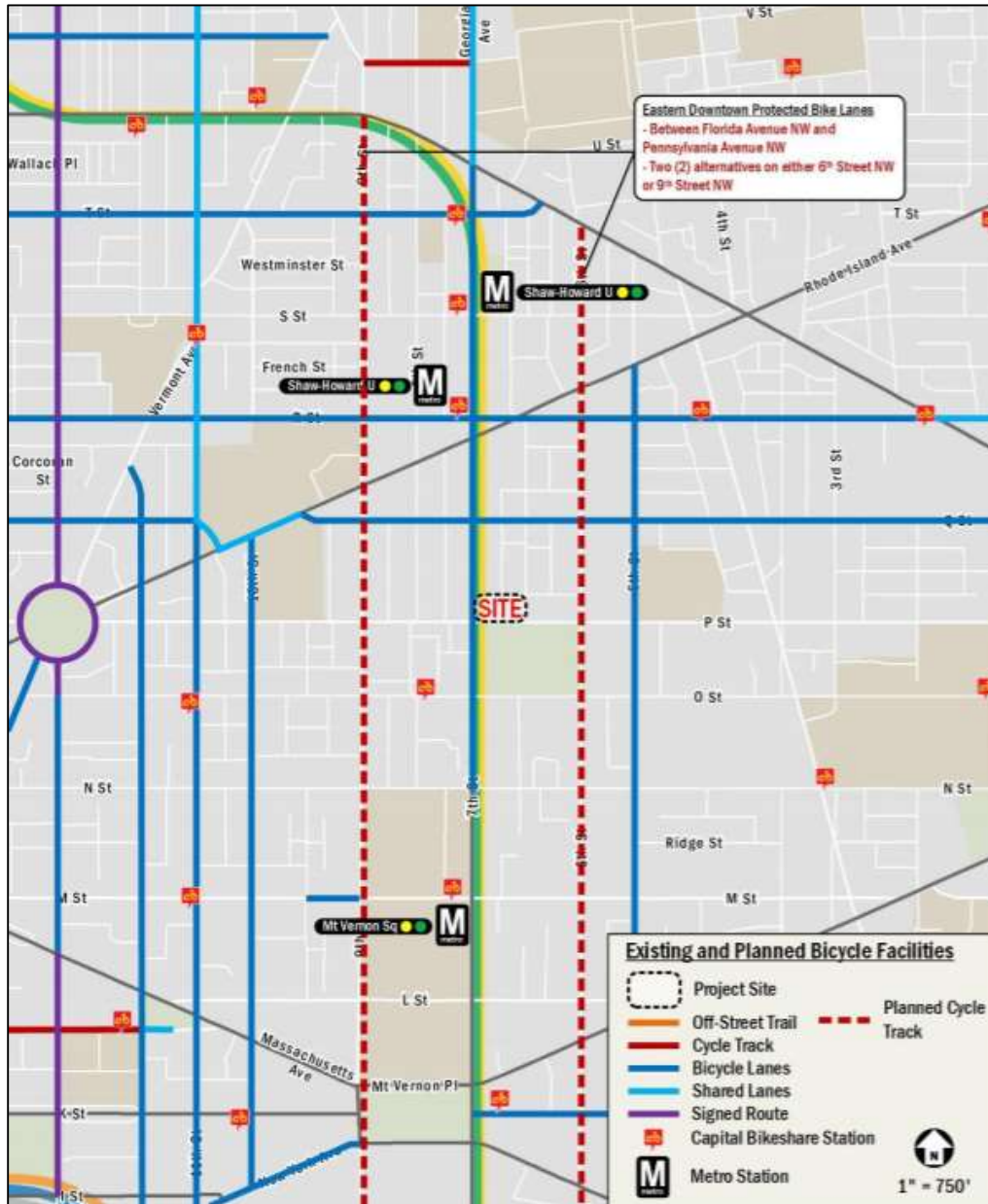
Bicycle Network

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 five (5) Capital Bikeshare stations with a total of 52 bicycles located within a ¼-mile of the site. Bicycle lanes are also available nearby on 7th Street NW, Q Street NW, R Street NW, and 5th Street NW. These facilities connect to the Metropolitan Branch Trail to the east of the site. Additionally, one protected bike route is planned nearby on 6th Street or 9th Street NW.

Figure 5 | Existing Bicycle Facilities (Source: Grove Slade 3/26/21 Transportation Statement, Figure 6)



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 0.2 miles, roughly a 5-minute walk, from the Shaw-Howard University Metrorail Station and 0.3 miles, roughly a 6-minute walk, from the Mt. Vernon Square Metrorail Station. Trains serve the Metrorail station every eight (8) minutes during weekday peak hours, 12 minutes during weekday non-peak times, and 15-20 minutes on weekends.

The site is also served by 17 bus stops within a ¼-mile of the site with routes along 7th Street NW, P Street NW, Rhode Island NW, 11th Street NW, R Street NW, and New Jersey Avenue NW. The proposed development is directly served by four (4) Metrobus routes.

Mitigations

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, a reduction in parking and implementation of 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 Zoning Order:

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 proposed a TDM Plan in the March 26, 2021 Transportation Statement which includes the following elements:

- Unbundle the cost of vehicle parking from the lease or purchase agreement for each residential or retail unit and charge a minimum rate based on the average market rate within a quarter mile.
- Identify Transportation Coordinators for the planning, construction, and operations phases of development. The Transportation Coordinators will act as points of contact with DDOT, goDCgo, and Zoning Enforcement.
- Will provide Transportation Coordinators' contact information to goDCgo, conduct an annual commuter survey of employees on-site, and report TDM activities and data collection efforts to goDCgo once per year.
- Transportation Coordinators will develop, distribute, and market various transportation alternatives and options to residents and employees, including promoting transportation events (i.e., Bike to Work Day, National Walking Day, Car Free Day) on property website and in any internal building newsletters or communications.
- Transportation Coordinators will receive TDM training from goDCgo to learn about the TDM conditions for this project and available options for implementing the TDM Plan.
- Provide residents and retail employees 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.
- Will not lease unused parking spaces to anyone aside from tenants of the building (e.g., will not lease to other nearby office employees, single-family home residents, or sporting events).
- Will meet or exceed ZR16 short- and long-term bicycle parking requirements. Long-term bicycle space will be provided free of charge to residents and employees. There are 65 long-term spaces required; 72 long-term spaces provided. Fourteen (14) short-term spaces required; 14 short-term spaces provided.
- Long-term bicycle storage room will accommodate non-traditional sized bikes including cargo, tandem, and kids bikes.
- Provide a bicycle repair station in each long-term bicycle parking storage room.
- Provide a free SmarTrip card or a complimentary Capital Bikeshare coupon good for one ride to every new resident and employee.
- Electrical outlets will be provided within the long-term bicycle storage room for the charging of electric bikes.
- Offer an annual CaBi membership to each resident and employee for the first year after the building opens.
- Following the issuance of a certificate of occupancy for the Project, the Project's Transportation Coordinator shall submit to the Office of Zoning for inclusion in the IZIS case record of the case

documentation summarizing compliance with the transportation and following TDM conditions of this Order.

- Five years after the issuance of the final certificate of occupancy for the Project, if the Transportation Coordinator has not established a relationship with DDOT or goDCgo, the Transportation Coordinator will submit a letter to the Zoning Administrator, DDOT, and goDCgo summarizing continued substantial compliance with the transportation and following TDM conditions in the Order, unless no longer applicable as confirmed by DDOT; provided, that if such letter is not submitted on a timely basis, the Applicant shall have sixty (60) days from date of notice from the Zoning Administrator, DDOT, or goDCgo to prepare and submit such letter.
- 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.
- 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.
- Install a Transportation Information Center Display (electronic screen) within the lobby containing information related to local transportation alternatives. At a minimum, the display should include information about nearby Metrorail stations and schedules, Metrobus stops and schedules, car-sharing locations, and nearby Capital Bikeshare locations indicating the availability of bicycles.
- Provide one (1) collapsible shopping cart (utility cart) for every 50 residential units, for a total of four (4) to encourage residents to walk to the grocery shopping and run errands. Will post "getting here" information in a visible and prominent location on the website with a focus on non-automotive travel modes. Also, links will be provided to godcgo.com, CommuterConnections.com, transit agencies around the metropolitan area, and instructions for patrons and employees discouraging parking on-street in Residential Permit Parking (RPP) zones.
- Transportation Coordinator will demonstrate to goDCgo that tenants with 20 or more employees who work on-site are in compliance with the DC Commuter Benefits Law and participate in one of the three transportation benefits outlined in the law (employee-paid pre-tax benefit, employer-paid direct benefit, or shuttle service), as well as any other commuter benefits related laws that may be implemented in the future.
- Ownership of building will offer discounted annual memberships to on-site retail employees via the Capital Bikeshare Corporate Membership program.

DDOT finds the proposed TDM plan to be sufficiently robust for this project if implemented in conjunction with the requested pedestrian network improvements.