

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
Associate Director 

DATE: March 8, 2021

SUBJECT: ZC Case No. 20-34 – 300 12th Street SW (Cotton Annex)

PROJECT SUMMARY

Jemals Cotton Annex, LLC (the “Applicant”) has requested approval of Special Exception Review in the D-8 Zone and a Variance to rehabilitate the existing 12-story Cotton Annex building and construct an addition on a 61,672 square-foot site at 300 12th Street SW. The variance relief would allow courts to vary from dimension requirements and relief from the prohibition against increased building density within the footprint of an existing designated historic structure set by the 2016 Zoning Regulations (ZR16). The proposal includes the following development program:

- 610-unit residential apartments;
- 1,368 SF ground-floor retail;
- 93 on-site vehicle parking spaces within a below-grade garage;
- 127 long-term and 32 short-term bicycle parking spaces; and
- One (1) 55-foot loading berth, one (1) 30-foot 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:

Site Design

- Vehicular access to both the parking garage and loading facilities is proposed via a single two-way entrance from private C Street SW. All existing curb cuts to 12th Street SW will be closed, consistent with DDOT standards;
- The project is meeting the ZR16 requirements for loading berths and delivery spaces by providing (1) 30-foot berth, and (1) 20-foot delivery spot;
- All loading activities are proposed to occur on private property with head-in/head-out movements, consistent with DDOT standards;
- There is no minimum vehicle parking requirement in the D-8 zone. 93 vehicle parking spaces are proposed in a below-grade parking garage;
- The Applicant proposes to meet the ZR16 minimum requirements of 127 long-term and 31 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 site is located two (2) blocks south of the Smithsonian Metrorail station;
- The CTR assumed approximately 30-40% of trips would travel by vehicle and the remainder by walking, bicycling, or transit; and
- The proposed development is projected to generate a significant amount of vehicle and transit trips. This represents an increase in vehicle trips during the weekday AM and PM peak hours as compared to if office uses were to re-occupy the vacant building.

Multi-Modal Evaluation

- The site is surrounded by a mostly complete pedestrian network. However, many of the pedestrian facilities are not up to modern ADA standards along anticipated walking routes to nearby amenities; and
- There is an existing Capital Bikeshare station on the opposite corner of 12th Street and C Street that is anticipated to be used heavily once this project is complete.

Traffic Impact Analysis

- The Applicant utilized sound methodology and assumptions to perform the traffic impact analysis and Comprehensive Transportation Review (CTR) study;
- The CTR indicated that two (2) of the study intersections would unacceptably degrade in level of service (LOS), per DDOT mitigation policy, due to the addition of site-generated vehicle trips triggering the need for mitigation at 12th Street SW & C Street, and 13th Street SW and C Street; and
- The Applicant has proposed a Transportation Demand Management (TDM) plan in the February 8, 2021 CTR to mitigate the increase in vehicular traffic, which DDOT finds is not sufficiently robust to offset impacts to the two intersections.

Mitigations

To offset the increase in vehicle trips on the roadway network resulting in impacts to two (2) intersections, the Applicant should add several physical improvements to the pedestrian and bicycle networks to the TDM Plan to encourage walking, bicycling, and sustainability:

- Install two (2) Capital Bikeshare expansion plates;
- Upgrade curb ramps and crosswalks at 13th Street at C Street SW;
- Install additional long-term bicycle parking; and
- Install two (2) electric vehicle charging stations.

RECOMMENDATION

DDOT has no objection to approval of this Special Exception and Variance application with the following conditions:

- Implement the Transportation Demand Management (TDM) Plan as proposed in the Applicant's February 8, 2021 CTR (Exhibit 9A), for the life of the project, unless otherwise noted, with the physical improvements and revisions requested by DDOT (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 minimal 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;
- Coordinate with DDOT's Active Transportation Branch, Neighborhood Planning Branch, and TOSD regarding design and implementation of the pedestrian and bicycle network improvements; and
- Coordinate with DDOT's Urban Forestry Division (UFD) and the Ward 6 arborist to confirm existing trees on site and determine next steps for preservation versus removal.

TRANSPORTATION ANALYSIS

DDOT requires applicants requesting an action from the Zoning Commission complete a Comprehensive Transportation Review (CTR) 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 CTR should be performed according to DDOT direction. The Applicant and DDOT coordinated on an agreed-upon scope for the CTR that is consistent with the scale of the action.

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 CTR to determine its accuracy and assess the action's consistency with the District's vision for a cohesive, sustainable transportation system that delivers safe and convenient ways to move people and goods, while protecting and enhancing the natural, environmental, and cultural resources of the District.

Site Design

Site design, which includes site access, loading, 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

Vehicular access to the parking garage is proposed via a two-way entrance/exit from a driveway off of private C Street SW. There are no alleys adjacent to the site. The loading dock area is also accessed via the driveway off C Street SW. The proposed access to both parking and loading meets DDOT's standard that all vehicular access be provided via the alley network or on private property. The project proposes one new curb cuts to private C Street SW will close all existing curb cuts on 12th Street SW consistent with DDOT standards for minimizing curb cuts. Pedestrian access to the residential building is via three (3) entrances: two (2) on 12th Street SW and one (1) near C Street SW. Figure 1 below shows the site layout of the proposed project.

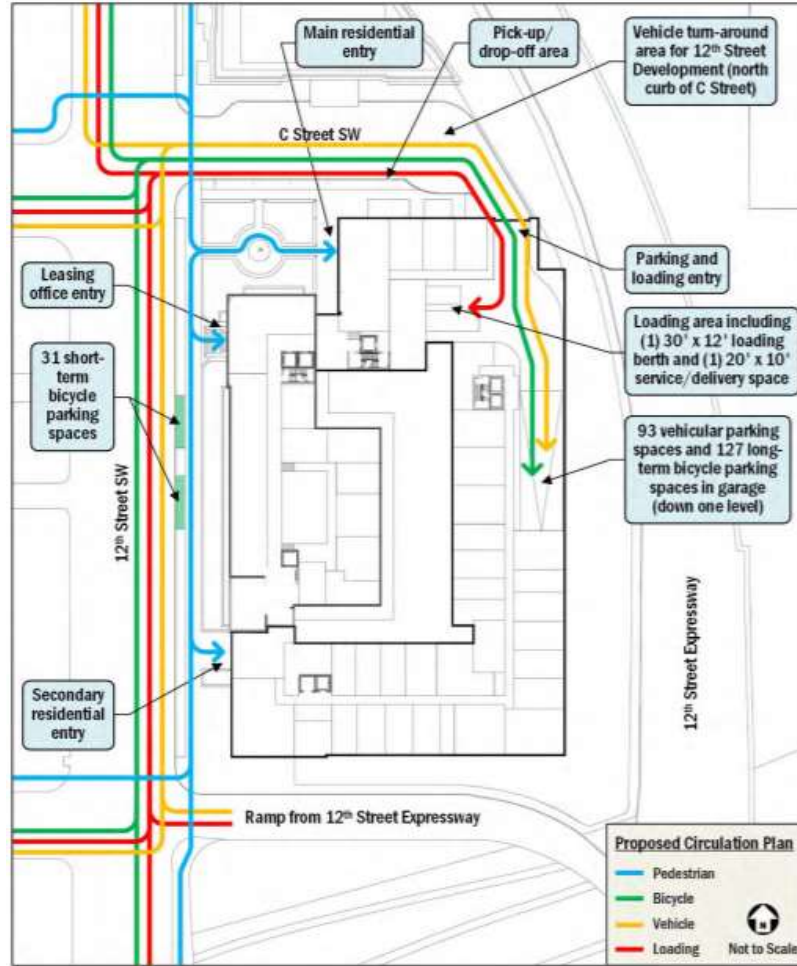


Figure 1 | Site Plan (Source: Gorove Slade, CTR Figure 7, 2/16/21)

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 zero (0) additional loading facilities. The Applicant is proposing to meet the ZR16 requirements and practical needs for loading by providing one (1) 30-foot berth and one (1) 20-foot delivery spaces, with a loading platform.

The building is designed so that all loading activities take place internally on the ground floor of the building. The loading facilities area accessed via private C Street SW through the same driveway as the vehicle parking garage. The truck turning diagrams included in the February 8, 2021 CTR demonstrate

that 30-foot trucks can enter and exit the loading area with head-in and head-out movements, consistent with DDOT standards. The Applicant anticipates approximately six (6) trucks per day will utilize the loading dock area, including 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 §702.3, vehicle parking is not required within the downtown (D-8) zone. The Applicant is proposing 93 vehicle parking spaces, equating to a vehicle parking ratio of 0.15 spaces per unit. The proposed parking ratio is far below DDOT's preferred maximum parking ratio of 0.30 spaces per unit released in the June 2019 *Guidance for Comprehensive Transportation Review* for site's located in close proximity to a Metrorail station.

The Applicant is not proposing any electric vehicle (EV) charging stations. DDOT recommends installing one (1) EV station for every 50 vehicle parking spaces. The Applicant should include a total of two (2) EV stations in the TDM Plan to encourage sustainability.

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 127 long-term and 31 short-term bicycle parking spaces. The Applicant is proposing to meet these requirements by installing 127 long-term spaces in the below-grade parking garage and 32 short-term spaces (16 inverted U-racks) in public space on 12th Street SW. The design and specific locations of short-term spaces are not shown on the submitted drawings, but should be installed according to DDOT's Bike Parking Guide and ZR16 design requirements. The final locations of short-term bicycle parking will be determined during public space permitting.

As mitigation for the impacted intersections, DDOT requests the Applicant increase the amount of long-term bicycle parking provided in the bike storage rooms by at least 20 spaces. Given there are over 600 units in the building, this additional long-term bike parking would improve the ability of residents to find a parking space for their bicycle.

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 and encourages the Applicant to participate in a Preliminary Design Review Meeting (PDRM) to address design related comments provided by DDOT and OP.

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:

- DDOT concurs that the existing curb cut on 12th Street SW should be closed and replaced with green space and street trees;
- The proposed curb cut on C Street SW will not need to be reviewed and approved by the Public Space Committee since the street is private;
- Design a curb extension into the roadway reconstruction plans for the south side of private C Street SW at 12th Street (not currently shown on the plans), consistent with the proposal by the other property owner on the opposite side of C street;
- Private C Street should be designed to DDOT standards so that in the future it can be accepted into the DDOT portfolio of public streets;
- Signage should be added at the corner of C Street and 12th Street stating that C Street is private;
- Installation of the missing curb ramps, upgraded substandard curb ramps, and missing high-visibility crosswalks at the intersection of 13th Street and C Street should be included in the Cotton Annex 12th Street SW streetscape permit application;
- Balconies on the back side of the property will require public space permits and Federal Highway Administration (FHWA) approval since they are located within 12th Street Expressway right-of-way; and
- Short-term bicycle parking racks should be within 120 feet of the primary building entrance and located within private space or the furnishing/tree zone of public space.

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 that there are a few large trees along 12th Street SW, C Street SW, and the 12th Street Expressway that include Special Trees and a potentially non-hazardous Heritage Tree. DDOT recommends the Applicant coordinate with the Ward 6 arborist to confirm existing trees on site and determine next steps for preservation versus removal.

Travel Assumptions

The purpose of the CTR is to inform DDOT’s review of a proposed action’s impacts on the District’s transportation network. To that end, selecting reasonable and defensible travel assumptions is critical to 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 222 Multi-Family High-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, WMATA’s 2005 Development-Related Readership Survey, and the proposing parking supply. Figure 2 below shows the mode splits assumed for the traffic impact analysis within the CTR.

Figure 2 | Summary of Mode Split Assumptions (Source: Gorove Slade 2/16/21 CTR, Table 3)

Land Use	Mode			
	Drive	Transit	Bike	Walk
Existing Office	40%	55%	2%	3%
Proposed Residential	30%	45%	10%	15%
Proposed Retail	30%	50%	5%	15%

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

Figure 3 | Multi-Modal Trip Generation Summary (Source: Gorove Slade 2/16/21 CTR, Table 5)

Mode	Land Use	AM Peak Hour			PM Peak Hour			Weekday Total
		In	Out	Total	In	Out	Total	
Auto (veh/hr)	Residential	14	41	55	40	25	65	785
	Retail	1	0	1	1	1	2	16
	Total	15	41	56	41	26	67	801
Transit (ppl/hr)	Residential	24	74	98	70	45	115	1,389
	Retail	1	0	1	2	3	5	48
	Total	25	74	99	72	48	120	1,437
Bike (ppl/hr)	Residential	5	17	22	16	10	26	309
	Retail	0	0	0	0	0	0	5
	Total	5	17	22	16	10	26	314
Walk (ppl/hr)	Residential	7	25	32	23	14	37	463
	Retail	0	0	0	1	0	1	14
	Total	7	25	32	24	14	38	477

The proposed project is expected to generate a significant number of vehicle and transit trips and a moderate amount of bicycle and walking trips during the peak hours. However, as compared to reoccupying the existing office building and surface parking lot, the proposed residential development would generate a slight net increase in vehicle trips during the morning peak hour and slight net decrease in vehicle trips during evening peak hour. Figure 4 below shows a comparison of vehicle trips between the existing building fully occupied with their current uses versus the proposed development program.

Figure 4 | Comparison of Existing Uses vs Proposed Development (Source: Gorove Slade 2/16/21 CTR, Table 6)

Land Use	AM Peak Hour (veh/hr)			PM Peak Hour (veh/hr)		
	In	Out	Total	In	Out	Total
Proposed Project Trip Generation Compared to Existing Commercial Parking Lot Trip Generation						
Existing Commercial Parking Lot	15	3	18	37	45	82
Proposed Project	15	41	56	41	26	67
Net Auto Trips	0	38	38	4	-19	-15
Proposed Project Trip Generation Compared to Approved Office Trip Generation						
Approved Office	31	5	36	5	27	32
Proposed Project	15	41	56	41	26	67
Net Auto Trips	-16	36	20	36	-1	35

Since the net increase in vehicle trips is greater than 25 for either the inbound or outbound direction in at least one of the study peak periods, DDOT required the Applicant to complete a Comprehensive Transportation Review (CTR) study with a traffic impact analysis (TIA).

Multi-Modal Network Evaluation

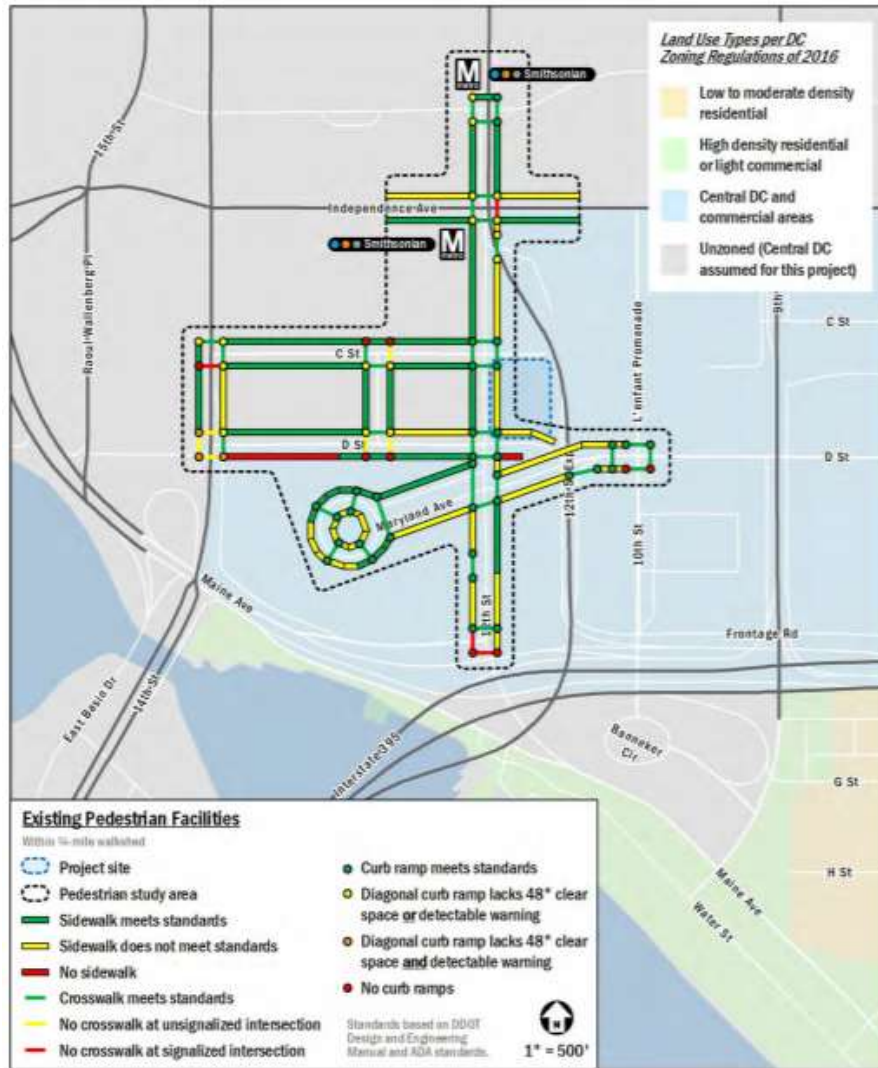
Pedestrian Network

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 public 12th Street SW and private C Street SW and upgrade any pedestrian facilities to current DDOT standards.

The Applicant’s inventory of existing pedestrian infrastructure, as shown in Figure 5 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.

To help offset traffic impacts identified in the CTR, DDOT requests the Applicant install the missing curb ramps and crosswalks and substandard pedestrian facilities at the intersection of C Street and 13th Street SW. Additionally, the Applicant should design a curb extension into their roadway reconstruction plans on the south side of private C Street at 12th Street, consistent with the proposal for the northern half of C Street by the adjacent property owner. DDOT notes that the final design of the curb ramps and crosswalks will occur during public space permitting.

Figure 5 | Existing Pedestrian Network (Source: Gorove Slade 2/16/21 CTR, Figure 28)

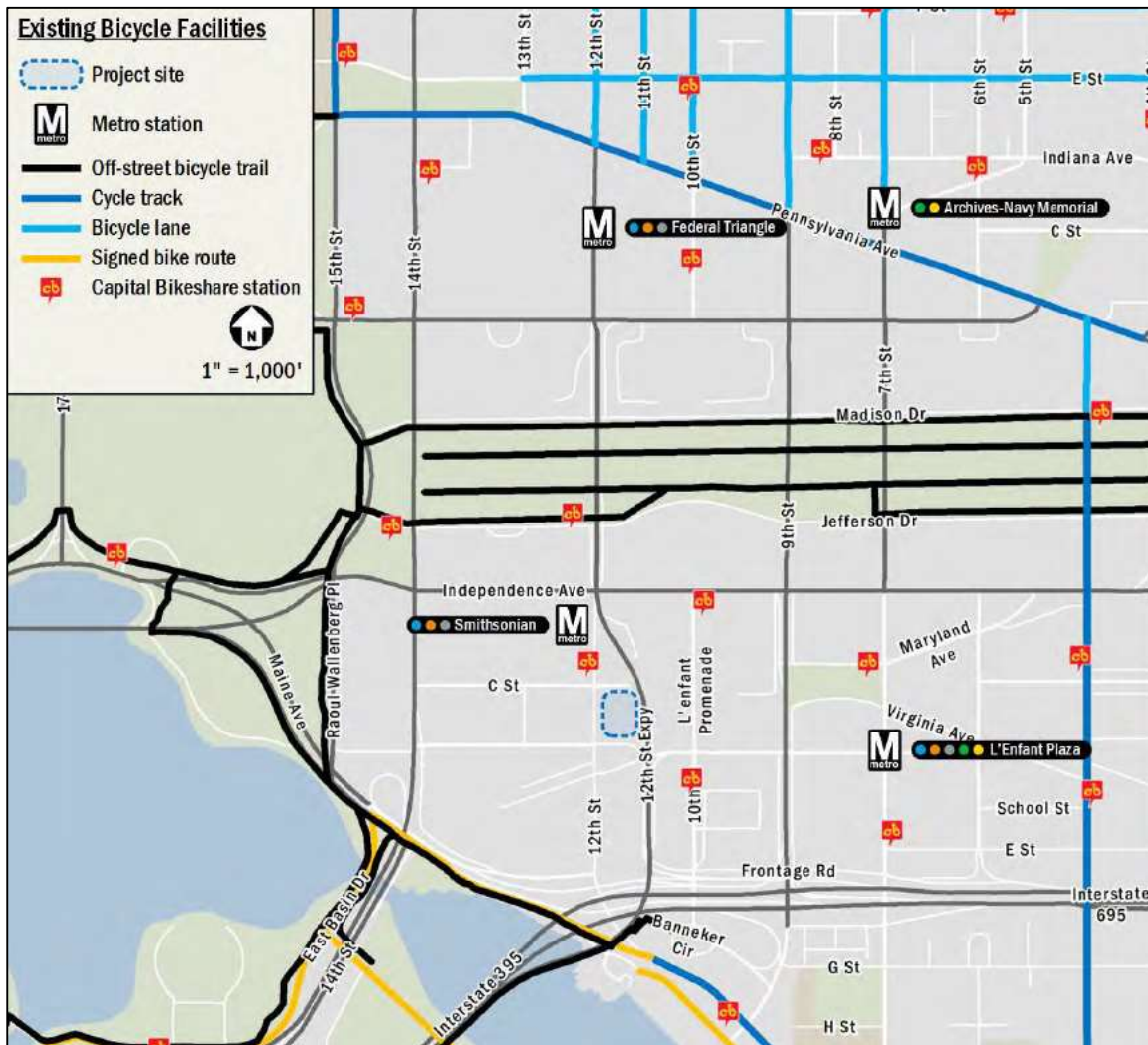


Bicycle Network

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 6, there are currently no bicycle lanes within the vicinity of the site. There are several Capital Bikeshare (CaBi) stations within a short-distance of the site, with one station located across 12th Street SW. To help offset the traffic impacts identified in the CTR, DDOT requests the Applicant install two (2) 4-dock expansion plates to this CaBi station. This station is one of the program’s most popular stations and would benefit from the increase in docks to meet the additional potential demand generated by the proposed residential building.

Figure 6 | Existing Bicycle Facilities (Source: Grove Slade 2/16/21 CTR, Figure 30)



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 0.1 miles (2 blocks) from the Smithsonian Metrorail Station which is served by the Orange, Blue, Silver lines, and the L’Enfant Plaza Metrorail Station which is served by the Orange, Blue, Silver, Green and Yellow lines. Trains serve the Metrorail station every 6 minutes during weekday peak hours, 12 minutes during weekday non-peak times, and 15-18 minutes on weekends. The development site is also surrounded by six (6) Metrobus routes, two (2) DC Circulator routes, and a neighborhood shuttle route that travel along multiple primary corridors.

Curbside Management

The proposal includes a development alternative requested for consideration by the Advisory Neighborhood Commission (ANC) to remove the peak hour parking restrictions on the east side of 12th Street SW adjacent to the subject site. Under current conditions, parking along this block face is prohibited between 7:00 and 9:30 AM and between 4:00 and 6:30 PM, making it a travel lane during the AM and PM peak hours. The alternative would allow either curbside parking or some other curbside use, resulting in a reduction from three (3) to two (2) northbound travel lanes along 12th Street SW during the AM and PM peak hours.

DDOT does not support the removal of peak hour parking restrictions on 12th Street SW as it would adversely impact operations northbound and likely generate failing conditions with queues beyond C Street (this is further discussed in the traffic impact analysis section below). As such, DDOT recommends that peak period parking restrictions be maintained.

Traffic Impact Analysis (TIA)

To determine the proposed development's impacts on the transportation network, the Applicant completed a Traffic Impact Analysis (TIA) as a component of the larger CTR which includes an extensive analysis of existing conditions (2021 Existing), future with no development (2024 Background), future conditions with development (2024 Future), and future with development and curbside management modifications (2024 Future with Curbside) scenarios.

Background Developments and Regional Growth

As part of the analysis of future conditions, DDOT requires applicants to account for future growth in traffic on the network or what is referred to as background growth. The Applicant coordinated with DDOT on the appropriate background developments to include in the analysis.

DDOT requires Applicants account for regional growth through the build-out year of 2024. This can be done by assuming a general growth rate or by evaluating growth patterns forecast in MWCOG's regional travel demand model. The Applicant coordinated with DDOT on an appropriate measure to account for regional growth that accurately accounted for background growth on the network. Annually compounding background regional growth rates of between 0.10% and 2.00% were assumed in the study area, differing based on roadway and peak hour.

DDOT also requires applicants to consider future changes to the roadway network. It was determined in coordination with DDOT staff to include the rehabilitation of approach bridges to the 14th Street bridge, including the bridges over Maine Avenue, the Outlet Channel, and Hains Point Park. Assumptions are further discussed on page 25 of the February 8, 2021 CTR.

Study Area and Data Collection

The Applicant in conjunction with DDOT identified eight (8) existing intersections where detailed vehicle counts would be collected and a level of service analysis would be performed. These intersections are immediately adjacent to the site and include intersections radially outward from the site with the greatest potential to see impacts in vehicle delay (shown by Figure 8 in the February 8, 2021 CTR). DDOT acknowledges that not all affected intersections are included in the study area and there will be

intersections outside of the study area which would realize new trips. However, DDOT expects minimal to no increase in delay outside the study area as a result of the proposed action.

The Applicant analyzed 2021 traffic volumes comprised of turning movement count data collected by DDOT between 2017 and 2018, with applied growth based on the data collection year. Existing vehicle trip data could not be conducted in person for 2020 or 2021 due to the impacts of the COVID-19 pandemic.

Trip Distribution and Assignment

Trip distribution for the background development was determined based on Census Transportation Planning Productions (CTPP) Traffic Analysis Zone (TAZ) data. The trips generated by the background developments and proposed project were distributed through the study area intersections. The Applicant conducted both an intersection capacity analysis expressed by the projected level of service at each intersection and a queueing analysis to determine the maximum back of queue at each intersection.

Roadway Capacity and Operations

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

The roadway capacity analysis provided in the CTR demonstrated that under the 2024 Future Condition, two (2) of the eight (8) study intersections would have an approach that resulted in an unacceptable level of service (LOS E or F) due to the addition of site generated traffic, per DDOT mitigation policy. These intersections include 12th Street at C Street SW and 13th Street at C Street SW. The 2024 Future with Curbside Management Condition scenario also results in the same two (2) intersections functioning at an unacceptable level of service. The CTR proposes several mitigations to address the additional vehicular delay:

- Implement a Transportation Demand Management (TDM) Plan; and
- Implement traffic signal timing adjustments to increase green time.

DDOT does not update traffic signal timings in conjunction with a specific land development project since signals are typically part of coordinated networks that would lead to other upstream and downstream impacts. Instead DDOT requests the Applicant implement additional pedestrian and bicycle improvements to improve the non-auto mode share of trips. See Mitigations section below.

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:

Pedestrian Network

To offset the intersection impacts identified in the CTR, the Applicant should upgrade sub-standard curb ramps and stripe missing crosswalks at the intersection of C Street SW and 13th Street SW, as well as design a curb extension into the roadway reconstruction plans for the south side of private C Street at 12th Street SW.

Bicycle Network

In addition to the pedestrian improvements noted above, the Applicant should also expand the existing Capital Bikeshare station on the corner of 12th Street SW and C Street SW by eight (8) docks (two 4-dock expansion plates). This station is one of the program's most popular stations and would benefit from the increase in docks to meet the additional potential demand generated by the proposed residential building.

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 February 8, 2021 CTR which includes the following elements:

- Unbundle the cost of vehicle parking from the lease or purchase or lease agreement for each residential and retail unit and charge a minimum rate above the average market rate within a quarter mile. Free parking or discounted rates will not be provided.

- Identify Transportation Coordinators for the planning, construction, and operations phases for each retail tenant and the entire residential component/building. The Transportation Coordinators will act as points of contact with DDOT, goDCgo, and Zoning Enforcement.
- 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. All employer tenants must survey their employees and report back to the Transportation Coordinator.
- Transportation Coordinators will develop, distribute, and market various transportation alternatives and options to the 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.
- Transportation Coordinator will subscribe to the applicable goDCgo's newsletters.
- Transportation Coordinator will notify goDCgo each time a new retail tenant moves in and provide TDM information to each tenant as they move in.
- Transportation Coordinator will provide links to CommuterConnections.com and goDCgo.com on property websites.
- Transportation Coordinator will post all TDM commitments on property websites, publicize availability, and allow the public to see what commitments have been promised.
- Transportation Coordinators will implement a carpooling system such that individuals working in the building who wish to carpool can easily locate other employees who live nearby.
- 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.
- Provide residents and 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.
- Following the issuance of a certificate of occupancy for the project, the Transportation Coordinator will coordinate with 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, unless no longer applicable as confirmed by DDOT.
- Will meet ZR16 short- and long-term bicycle parking requirements. Long-term bicycle space will be provided free of charge to residents and retail employees.
- Long-term bicycle storage rooms will accommodate non-traditional sized bikes including cargo, tandem, and kids bikes.
- 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.

- Provide a FREE SmarTrip card to every new resident and a complimentary Capital Bikeshare coupon good for one ride.
- 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).
- Install a Transportation Information Center Display (electronic screen) 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 a bicycle repair station in the bicycle parking storage rooms.
- Will post "getting here" information in a visible and prominent location on the website with a focus on nonautomotive travel modes. Also, links will be provided to godcgo.com, CommuterConnections.com, transit agencies around the metropolitan area, and instructions for customers discouraging parking on-street in Residential Permit Parking (RPP) zones.

DDOT finds the proposed TDM plan not sufficiently robust to support the low parking ratio and offset intersection impacts. If implemented in conjunction with the following additions and revisions, DDOT would have no objection to the approval of this project:

- Add to TDM Plan: Upgrade all substandard and missing curb ramps and install high-visibility crosswalks on all legs of the intersection of C Street and 13th Street SW;
- Add to TDM Plan: Install two (2) 4-dock expansion plates to the existing Capital Bikeshare station at the intersection of C Street at 12th Street SW;
- Add to TDM Plan: Install an additional 20 or more long-term bicycle parking spaces in the bike storage rooms.
- Add to TDM Plan: Install two (2) electric vehicle charging stations in the parking garage;
- Add to TDM Plan: Following the issuance of a certificate of occupancy for the Project, the Transportation Coordinator shall submit documentation 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.

AC:kv