

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, PSD 

DATE: May 5, 2022

SUBJECT: ZC Case No. 22-08 – 4401-4435 Benning Road NE

PROJECT SUMMARY

NRP Properties, LLC (the “Applicant”) has requested approval of a Design Review application to redevelop a 25,925-square-foot property bounded by Benning Road to the north, a 7-Eleven to the east, a 20-foot unimproved “paper” alley to the south, and multi-family residential to the west. The site currently contains a one-story vacant office building and an open green area. The proposal to construct a mixed-use development includes the following development program:

- 109 residential units, all affordable up to 80% AMI;
- 13 off-street vehicle parking spaces, with two (2) spaces for pick-up/drop-off;
- 45 long-term and six (6) 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 a two-way 20-foot curb cut entrance from Benning Road NE;
- Given the rear “paper” alley’s lack of connectivity to a public street and on-site pick-up/drop-off needs, DDOT supports the proposed curb cut to Benning Road;
- 13 off-street vehicle parking spaces are proposed, including 11 within an at-grade parking garage and two (2) within the front yard for pick-up/drop-off. DDOT supports the requested relief from five (5) parking spaces given the site’s proximity to the Benning Road Metrorail station;
- The project meets zoning requirements for loading by providing one (1) 30-foot berth and (1) 20-foot delivery spot within the at-grade parking garage;
- All loading activities are proposed to occur with head-in/head-out movements consistent with DDOT standards;
- The Applicant proposes to exceed zoning bicycle parking requirements by providing 45 long- and six (6) short-term spaces;
- The proposed development is projected to generate a nominal number of vehicle and people trips;
- The CTR’s on-street parking occupancy study show that the surrounding area’s existing curbside conditions can absorb the additional parking demand that may be generated by the proposed development; and
- The TDM plan proposed in the April 1, 2022, CTR is sufficiently robust to encourage non-auto travel, with a few minor revisions requested by DDOT.

RECOMMENDATION

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

- Implement the Transportation Demand Management (TDM) Plan as proposed in the Applicant’s April 1, 2022, CTR (Exhibit 12A), for the life of the project, unless otherwise noted, with several minor changes noted in the TDM section at the end of this report; and
- Include signage for the two (2) parking spaces in the front yard of the development noting that the area is only for pick-up/drop-off purposes. The two (2) spaces will also be screened with landscaping to minimize visibility from the public sidewalk on Benning Road NE.

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;

- 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; and
- Coordinate with DDOT’s Urban Forestry Division (UFD) and the Ward 7 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 Comprehensive Transportation Review (CTR) 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.

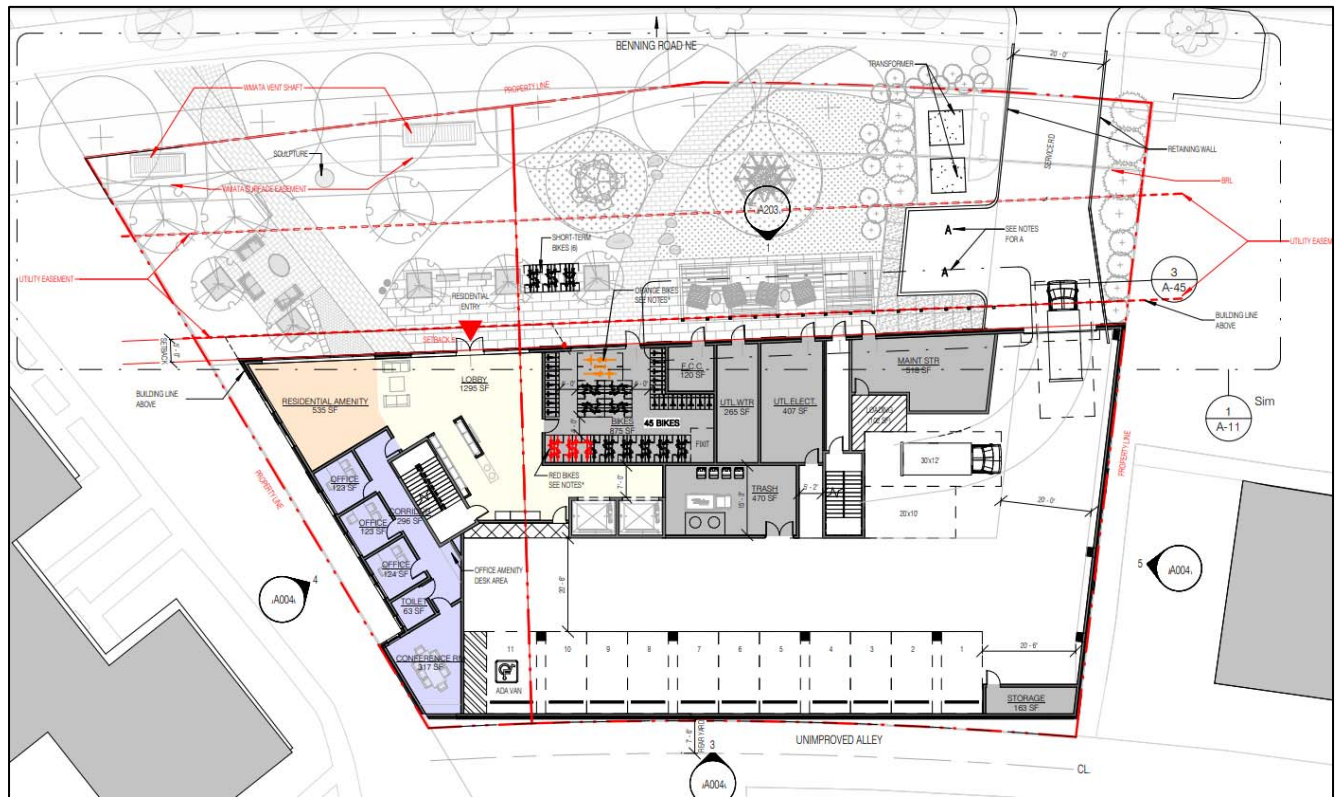
Site Design

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

Pedestrian access to the building is via two (2) entrances at the front of the building off Benning Road NE which access the main lobby and the stairwell. Vehicular access to the parking garage is proposed via a two-way entrance/exit from a 20-foot-wide curb cut on Benning Road NE. The “paper” alley adjacent to the site does not connect to the existing alley located several hundred feet southeast of the site. The loading dock and pick-up/drop-off areas are also accessed via the curb cut on Benning Road NE. Given that the “paper” alley is not currently able to connect to existing alley infrastructure, DDOT supports the proposed vehicle access via the curb cut on Benning Road NE. Figure 1 below shows the site layout of the proposed project.

Figure 1 | Site Plan



Source: PGN Architects, 4/26/2022, Exhibit 13A1

Loading

DDOT’s practice is to accommodate loading operations safely and efficiently, while prioritizing pedestrian and bicycle safety and limiting negative impacts 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 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 loading platforms.

The building is designed so that all loading activities take place in the private garage accessed via a curb cut on Benning Road NE. The truck turning diagrams included in the April 1, 2022, CTR demonstrate that 30-foot trucks can enter and exit the garage with head-in and head-out movements, consistent with DDOT standards that loading takes place outside of public space. The loading dock area will include trash pick-up, mail drop-off, and move-ins/outs by residents. Given that the proposed loading dock is consistent with DDOT standards, a Loading Management Plan (LMP) is not required.

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 ZR16 Subtitle C §701.5 and §702.1, the Applicant is required to provide a minimum of 18 parking spaces, inclusive of the 50% parking reduction since the site is within a ½-mile from the Benning Road Metrorail Station. The Applicant is proposing a total of 13 off-street parking spaces which includes 11 spaces in an at-grade garage and two (2) spaces in the front yard for pick-up/drop-off only. The Applicant is therefore requesting special exception relief from five (5) off-street parking spaces, which DDOT supports given the site's proximity to the Benning Road Metrorail Station and low projected vehicle trips (discussed further in the Travel Assumptions section). The Applicant, however, must include signage noting that the two (2) parking spaces in the front yard are for pick-up/drop-off purposes only and ensure that the spaces are screened with landscaping from the public sidewalk.

Bicycle Parking

Per ZR16 Subtitle C §802.1, the Applicant is required to provide 36 long-term and five (5) short-term bicycle parking spaces. The Applicant is proposing to exceed these requirements by installing 45 long-term spaces in the parking garage and six (6) short-term spaces on private property near the main entrance to the building. The Applicant should ensure that a minimum of 50% of spaces are located horizontally on the ground of the storage room.

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 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:

- There is a 15-foot Building Restriction Line (BRL) along the Benning Road frontage. The area between the BRL and property line is the building restriction area and is regulated like DDOT public space. This area is intended as greens pace and should remain park-like in nature with landscaping;

- The proposed curb cut should not exceed 24 feet in width and will need to be approved by the Public Space Committee. Ensure there are adequate pedestrian facilities crossing the driveway;
- The transformers, vaults, and two (2) surface parking spaces should be screened from the sidewalk with vegetation. Additionally, DDOT could support the Applicant providing art wraps around the transformers as part of the Arts in the Right-of-Way (AROW) program, with WMATA's approval;
- Lead walks should not exceed 6 feet wide in public space;
- Fencing for the tot lots should not exceed 42 inches in height; and
- The design of the sidewalk and tree box zone should be constructed consistent with the Benning Road Bridges and Transportation Improvements Project.

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 one (1) electric vehicle (EV) space 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. 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 and the Department of Energy and Environment (DOEE) has not released regulations. 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 20, 2022, report that there are zero (0) Heritage or Special Trees located on-site, however there are several Special trees along the fence line behind the dental building. It is recommended that the Applicant coordinate with the Ward 7 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 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, 11th Edition* (Land Use Code 223 Affordable Housing – Income Limits) 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 National Capital Region TPB State of the Commute survey. Figure 2 below shows the mode splits assumed for the proposed development.

Figure 2 | Mode Split Assumptions

Land Use	Mode			
	Drive	Transit	Bike	Walk
Affordable Housing	15%	70%	5%	10%

Source: *Gorove Slade 4/1/22 CTR, Table 6*

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

Figure 3 | Multi-Modal Trip Generation Summary

Mode	Land Use	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Auto (veh/hr)	Affordable Housing	2	4	6	4	4	8
Transit (ppl/hr)	Affordable Housing	10	23	33	25	16	41
Bike (ppl/hr)	Affordable Housing	1	1	2	2	1	3
Walk (ppl/hr)	Affordable Housing	1	4	5	3	3	6

Source: *Gorove Slade 4/1/22 CTR, Table 7*

The proposed project is expected to generate a minimal number of vehicle, transit, bicycle and walking trips during the peak hours. A traffic impact analysis was not required given that the proposed development is expected to generate less than 25 vehicle trips or 100 person trips in either peak hour.

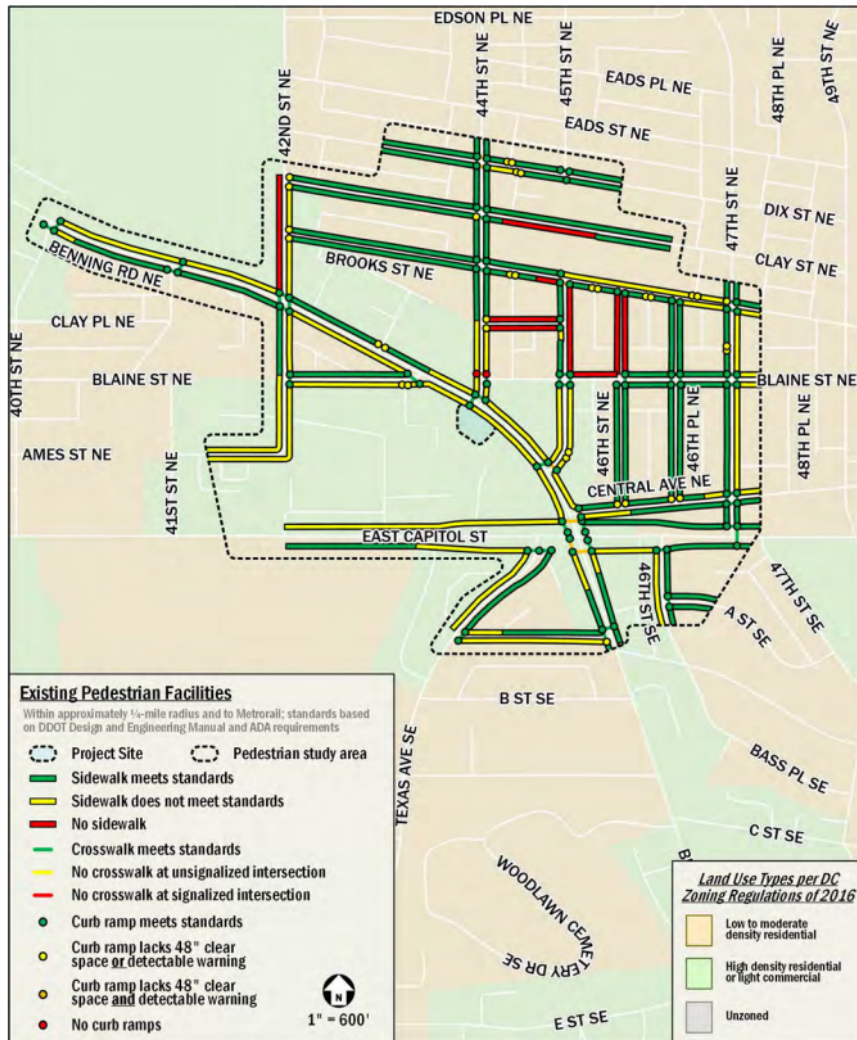
Multi-Modal Network Evaluation

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 of Benning Road NE 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 some sidewalks in the immediate vicinity of the site do not meet DDOT standards. Many of these deficiencies will be addressed during construction of the next phase of the Benning Road Bridges and Transportation Improvements Project.

Figure 4 | Existing Pedestrian Network



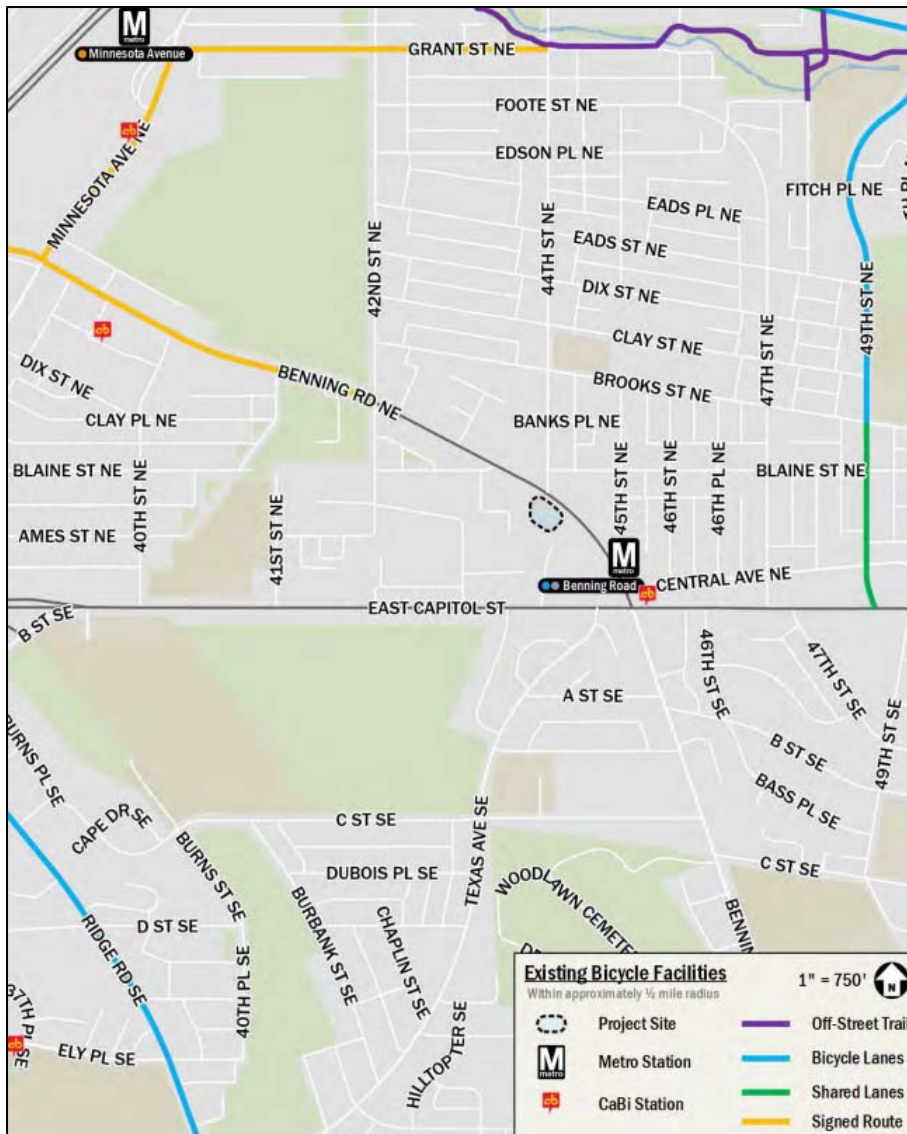
Source: Gorove Slade 4/1/2022, Figure 8

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 currently no bicycle lanes and one (1) Capital Bikeshare stations in the vicinity of the site. DDOT is not planning any protected bikeways along the Benning Road NE corridor.

Figure 5 | Existing Bicycle Facilities



Source: Gorove Slade 4/1/2022 CTR, 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.

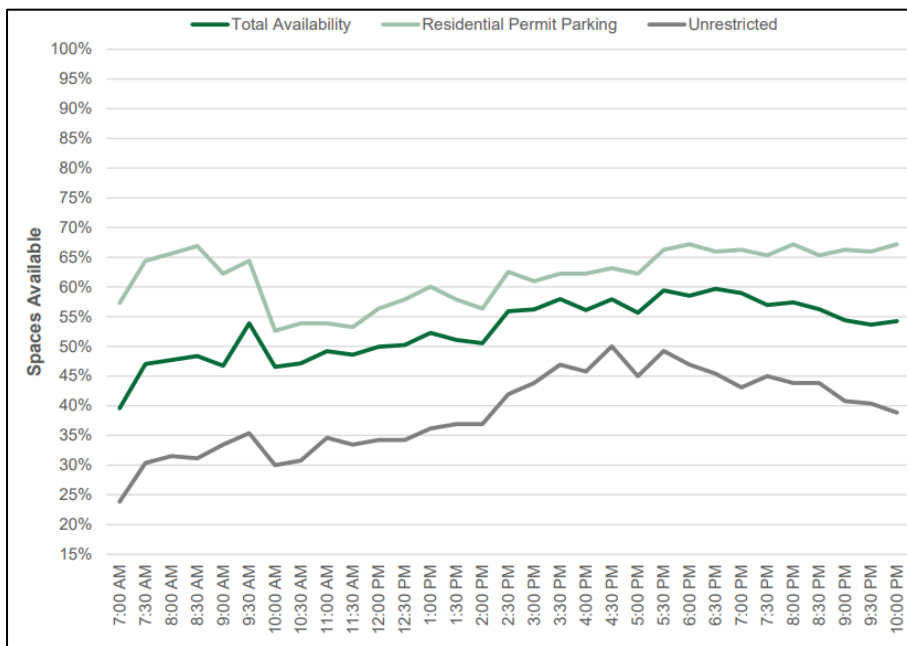
The site is served by four (4) Metrobus lines carrying six (6) routes (Routes 96, U5, U6, V7, V8, and W4) and is within 0.1 miles, roughly a three-minute walk, from the Benning Road Metrorail Station which is served by the Blue and Silver Lines. Trains currently serve the Metrorail station every 20 minutes on weekdays and 24 minutes on weekends.

Curbside Management

For parking relief actions of five (5) or more spaces or larger developments that may have a greater impact on the local neighborhood, the CTR must evaluate the supply of and demand for curbside parking space within walking distance of the site. The study area is largely residential and includes a total of 714 on-street parking spaces, with a mixture of RPP spaces without restriction or with rush-hour parking restrictions (*Figures 10 and 11, April 1, 2022, CTR*).

Traditionally, an 85 percent occupancy rate is considered an ideal level of parking utilization to accommodate demand from incoming vehicles. The April 1, 2022, CTR found that the existing occupancy rate never exceeded 70 percent for either RPP spaces or unrestricted spaces (Figure 6). As such, the analysis shows that the existing curbside conditions can absorb additional parking demand that may be generated by the proposed development. Per the site plan shown in Figure 3, however, all vehicle trips can be accommodated on-site with the proposed parking garage.

Figure 6 | On-Street Parking Availability



Source: *Gorove Slade 4/1/2022 CTR, Table 5*

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 with 20 or more residential units, 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 April 1, 2022, CTR which includes the following elements:

- Identify a Transportation Coordinator for the planning, construction, and operations phases of development;
 - The Transportation Coordinator will act as the point of contact with DDOT, goDCgo, and Zoning Enforcement and will provide their contact information to goDCgo.
- Develop, distribute, and market various transportation alternatives and options to residents, including promoting transportation events (e.g., Bike to Work Day, National Walking Day, Car Free Day) on the property website and in any internal building newsletters or communications;

- Direct the Transportation Coordinator to subscribe to goDCgo’s residential newsletter and receive TDM training from goDCgo to learn about the transportation conditions for this project and available options for implementing the TDM Plan;
- Provide welcome packets to all new residents that will, 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.
- Post all transportation and TDM commitments on the building website, publicize availability, and allow the public to see what has been promised;
- Offer a SmarTrip card and one (1) complimentary Capital Bikeshare coupon good for a free ride to every new resident;
- Provide at least six (6) short- and 45 long-term bicycle parking spaces, exceeding ZR16 minimum requirements for at least five (5) short- and 36 long-term bicycle parking space;
- Accommodate non-traditional sized bikes including cargo, tandem, and kids bikes in the long-term bicycle storage room, with a minimum 5% of spaces (two spaces) that will be designed for longer cargo/tandem bikes, and a minimum of 10% of spaces (five spaces) that will be designed with electrical outlets for the charging of electric bikes and scooters; and
 - There will be no fee to building employees or residents for usage of the bicycle storage room.
- Install a minimum of one (1) electric vehicle (EV) charging station, per DDOT recommendations of a minimum of one (1) out of every 50 vehicle parking spaces being served by an EV charging station.

DDOT finds the proposed TDM plan to be sufficiently robust for this project, given the site’s proximity to the Metrorail Station and the excellent (low) parking ratio. However, DDOT has the following revisions that should be incorporated into the TDM Plan at the time of drafting the Zoning Order to match the language from the latest version of DDOT’s standard TDM Plans:

- Add bullet: Unbundle the cost of vehicle parking from the lease or purchase agreement for each residential unit and charge a minimum rate based on the average market rate within a quarter mile; and
- The long-term bicycle storage room bullet should be revised to state that at least 50% of spaces will be provided horizontally and located on the ground.

AC:kv