

# 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:** October 30, 2020

**SUBJECT:** ZC Case No. 66-68A – Edgewood Terrace

---

#### PROJECT SUMMARY

Enterprise Community Development, Inc. (the “Applicant”) has requested approval of a Modification of Significance to an existing Planned Unit Development (PUD) in order to construct a 150,156 SF senior living facility. The project is located on a vacant portion of a 14.9-acre campus bounded by 4<sup>th</sup> Street NE to the west, Edgewood Street NE to the north, a shopping center being redeveloped (LTR 2017-02) to the south, and the Metropolitan Branch Trail to the east. The proposal to modify the existing PUD approved in 1976 includes the following development program and modifications:

- 151 senior living apartments (60% the MFI);
- 9,600 SF supportive services;
- 7,000 SF adult day care;
- Five (5) new ADA vehicle parking spaces;
- 28 long-term bicycle spaces; and
- Curbside loading area on private property.

#### 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 an existing 20-foot private driveway that connects to 4<sup>th</sup> Street NE. The Bryant Street redevelopment (LTR 2017-02) will be reconfiguring the driveways to both sites and realigning a consolidated driveway opposite Channing Street NE;
- The overall campus has 423 spaces, of which approximately 103 are unused on a typical day. This project will be providing five (5) new ADA parking spaces and all additional parking demand will be absorbed by the surplus unused spaces;
- DDOT supports the construction of additional residential units while relying primarily on the existing over-supply of on-site parking;
- At the request of DDOT and OP, the Applicant is proposing curbside loading on the private driveway in order to keep the outdoor terrace that would be lost due to the height clearance of internal loading berths;
- Trash pick-up and deliveries by large trucks will occur next to the trash room door. Move ins and move outs will occur in a vehicle parking space or in the pick-up/drop-off area;
- The Applicant has provided a loading management plan (Exhibit 25B) to offset the impacts of the curbside loading, which DDOT finds acceptable for the requested areas of relief;
- The proposed development is projected to generate less than 25 vehicle trips in the peak direction during the weekday evening peak hours. As such, a Comprehensive Transportation Report (CTR) with capacity analysis was not required as part of this proposal. The Applicant did provide a Transportation Statement detailing site operations and trip generation estimates;
- The Applicant is asking for relief from the long-term bicycle parking spaces by 23 spaces. The Applicant has agreed with DDOT to implement a TDM program to address this reduction;
- The Bryant Street development (LTR 2017-02) has committed to constructing several pedestrian staircases to improve porosity through both sites; and
- DDOT requests the Applicant of this project construct a high-visibility crosswalk and curb ramps at each end are installed from the sidewalk adjacent to the building to the westernmost future staircase, if not completed by others. This is to ensure as many persons of all ages and abilities as possible can access the staircase.

## **RECOMMENDATION**

DDOT has no objection to approval of this Modification of Significance to a PUD application with the following conditions:

- Implement the Transportation Demand Management (TDM) Plan as proposed in the Applicant's September 24, 2020 Transportation Statement (Exhibit 18A), for the life of the project, unless otherwise noted (the TDM Plan is discussed in greater detail later in this report);
- Implement the Loading Management Plan (LMP) proposed in the Applicant's Transportation Statement Supplemental Memorandum (Exhibit 25B), for the life of the project, unless otherwise noted (the LMP is discussed in greater detail later in this report);
- The Applicant must ensure that all sidewalks are ADA accessible; and

- If not completed by others, the Applicant will stripe a high-visibility crosswalk and install curb ramps on their property connecting the sidewalk adjacent to the proposed building to the new westernmost staircase to the Bryant Street project, no later than one (1) year after the staircase is constructed.

### **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:

- Coordinate with DDOT Planning and Sustainability Division (PSD) and the developer of the Bryant Street development regarding the design of the future shared driveway to 4<sup>th</sup> Street and safe and accessible connections to the future staircases;
- Coordinate with goDCgo and DDOT's TDM Coordinator regarding implementation of the site's TDM Plan; and
- Coordinate with DDOT's Urban Forestry Division (UFD) and the Ward 5 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 and application materials to determine their 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**

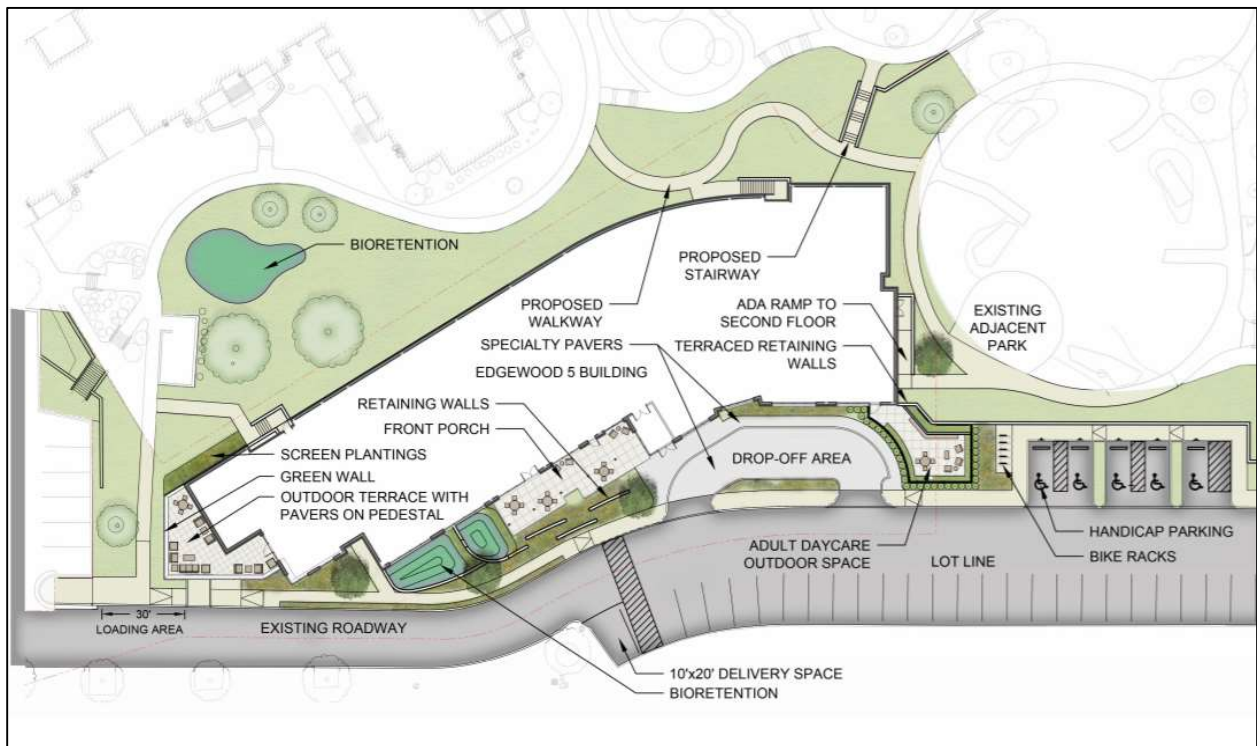
Site design, which includes site access, loading, vehicle parking, and public realm design, plays a critical role in determining a proposed action's impact on the District's infrastructure. While transportation impacts can change over time, the site design will remain constant throughout the lifespan 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 senior-living building is via several entrances, with the main entrance accessed from the drop-off area adjacent to the 20-foot private drive to the south of the building. The other entrances are located at the rear of the property (2 total entrances), at the outdoor patio adjacent to the drop-off area (1 door), and on the eastern side of the building to connect to the existing adjacent park (1 door).

Vehicular access to the site includes a drop-off area on the southern side of the building. The Applicant proposes five (5) new ADA-accessible handicap parking spaces to the east of the building. The project proposes no new curb cuts to the public street network but does include three new curb cuts on the private drive for access to the drop-off area and trash room. The private driveway connects to 4<sup>th</sup> Street to the west of the project. That entrance will be reconfigured by the Bryant Street redevelopment project south of the site (LTR 2017-02) and the consolidated driveway realigned opposite Channing Street NE. Figure 1 below shows the site layout of the proposed project.

**Figure 1 | Site Plan** (Source: Wiencek + Associates, Exhibit 25A1 10/28/2020)



**Loading**

DDOT’s practice is to accommodate vehicle loading in a safe and efficient manner, while at the same time preserving safety across non-vehicle modes and limiting any hindrance to traffic operations. For new developments, DDOT requires that loading take place in private space and that no back-up maneuvers occur in the public realm.

Per Subtitle C §901.1 and §901.4 of the 2016 Zoning Regulations (ZR16), residential properties with more than 50 units are required to provide one (1) loading berth, one (1) loading platform, and one (1)

20-foot delivery space. The Applicant is requesting relief from the following ZR16 regulations of Subtitle C:

- §901.1 Loading berth requirement
- §901.4 Adjacent loading platform requirement
- §901.10 Loading berth must only be used for loading requirement
- §908.1 Screening for loading spaces outside of a building requirement

The Applicant proposes to provide curbside trash pick-up along the 20-foot internal driveway and 30-foot loading zone area, at the request of DDOT and OP, in order to maintain the outdoor terrace above which would be eliminated if internal loading facilities are provided. Trash will be stored inside the building and bins rolled to the curb on private property. Move-in and move-out activities and deliveries will occur either in a vehicle parking space or within the pick-up/drop-off loop at the front entrance.

To help facilitate truck movement and manage conflicts with vehicles and pedestrians along the private drive, the Applicant has proposed the following Loading Management Plan (LMP) in the Transportation Statement Supplemental Memorandum (Exhibit 25B) for the project:

- A loading zone manager will be designated by the building management who will be on duty during delivery hours. The loading zone manager will be responsible for coordinating with vendors and residential tenants to schedule deliveries and move-ins/move-outs.
- Deliveries and move-in/outs will be scheduled outside of peak hours.
- Trash pick-up will occur curbside next to the trash room. Bins will be rolled to the truck, and trash trucks will not be permitted to block both lanes of travel.
- The loading zone manager will instruct all move-ins/move-outs to use an available parking space or the pick-up/dropoff loop, to the extent possible.
- The loading zone manager will monitor the loading area so that vehicles are only stopped in the loading area while actively loading or unloading.
- The loading zone manager will schedule deliveries such that the loading zone's capacity is not exceeded. In the event that an unscheduled delivery vehicle arrives while the loading zone is full, that driver will be directed to return at a later time when the loading zone will be available.
- Trucks using the loading zone will not be allowed to idle and must follow all District guidelines for heavy vehicle operation including but not limited to DCMR 20 – Chapter 9, Section 900 (Engine Idling), the goDCgo Motorcoach Operators Guide, and the primary access routes shown on the DDOT Truck and Bus Route Map ([godcgo.com/freight](http://godcgo.com/freight)).
- The loading zone manager will be responsible for disseminating suggested truck routing maps to the building's tenants and to drivers from delivery services that frequently utilize the development's loading zone. The loading zone manager will also distribute flyer materials, such as the MWCOG Turn Your Engine Off brochure, to drivers as needed to encourage compliance with idling laws. The loading zone manager will also post these materials and other relevant notices in a prominent location within the loading area.

DDOT concurs with the proposed LMP above and has no objection to the site's loading scheme and requested areas of relief so long as the LMP is included in the final Zoning Order.

### Vehicle Parking

The overall parking demand created by the development is primarily a function of land use, development square footage, price, and supply of parking spaces. However in urban areas, other factors contribute to the demand for parking, such as the availability of high quality transit, frequency of transit service, proximity to transit, connectivity of bicycle and pedestrian facilities within the vicinity of the development, and the demographic composition and other characteristics of the potential residents.

Subtitle C §701.5 of ZR16 requires the mixed-use residential development to provide 0.5 spaces for every 1,000 square feet for the proposed daytime care facility and one (1) space for every six (6) units for the publicly assisted housing. The proposed development is eligible, however, for a 50 percent parking reduction because the site is within a half-mile of the Rhode Island Metro station. As such, the vehicle parking requirement for the project is 15 spaces.

The Applicant is proposing a total of five (5) new vehicle parking spaces of which all are ADA accessible and 10 existing vehicle parking spaces reserved for use by the proposed development. The vehicle spaces are located on adjacent surface parking lots and are not located within the proposed building. As mentioned in the September 24, 2020 Transportation Statement, a parking study of the entire Edgewood Commons complex was completed in 2018, finding that the peak parking demand was 320 occupied spaces out of the 423 off-street spaces available on site, leaving an unused supply of 103 spaces. Due to this significant surplus of parking, DDOT finds the amount of vehicle parking proposed on-site to be consistent with the parking requirements in ZR16.

### 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 51 long-term and nine (9) short-term bicycle parking spaces. The Applicant is requesting relief from the long-term bicycle parking requirements and proposing to provide 28 long-term spaces in the parking garage and 10 short-term spaces around the perimeter of the site in public space. The long-term parking spaces are proposed to be in the basement of the building, with the short-term spaces located adjacent to the handicap parking spaces near the drop-off area of the building. Given the proposed use as an assisted senior-living facility, the projected minimal number of bicycle trips to and from the site discussed in the Travel Assumptions section, and the sufficiently robust TDM program proposed, DDOT has no objection to the requested bike parking relief.

### Streetscape and Public Realm

The site is unique in that it is surrounded entirely by private property and does not touch any DDOT right-of-way. Therefore, public space permits are not required for the private “public realm” design adjacent to the building. However, since the public may not know where DDOT public space ends and the Applicant’s private property begins, it is still expected the Applicant will provide a high-quality streetscape that is safe, ADA accessible, and as close to DDOT standards as possible. As such, DDOT

requests a condition that the Applicant ensure a high-visibility crosswalk and curb ramps are constructed from the sidewalk adjacent to the building to the future westernmost staircase to the Bryant Street project, if not constructed by others. The developer of the project to the south has committed to installing several staircases between the two sites. It is also noted that as part of the Applicant’s revised plans, a grass buffer has been added to the section of the private sidewalk network adjacent to the proposed building, which DDOT supports.

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. UFD did not identify any Heritage Trees or Special Trees on-site and recommends that the Applicant coordinate with the Ward 5 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, 10<sup>th</sup> Edition* (Land Use Code 252 Senior Adult Housing – Attached in a General Urban/Suburban Setting, Code 495 Recreation Community Center in a General Urban/Suburban Setting) 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 Transportation Planning Board’s State of the Commute survey. 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 9/24/2020 Transportation Statement, Figure 5)**

Land Use	Mode			
	Auto	Transit	Bike	Walk
Senior Housing	25%	50%	2%	23%
Adult Day Care	60%	25%	2%	13%

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 9/24/2020 Transportation Statement, Figure 6)**

Mode	Land Use	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Auto (veh/hr)	Senior Housing	3	5	8	5	4	9
	Adult Day Care	6	2	8	4	6	10
	<b>Total</b>	<b>9</b>	<b>7</b>	<b>16</b>	<b>9</b>	<b>10</b>	<b>19</b>
Transit (ppl/hr)	Senior Housing	6	12	18	13	10	23
	Adult Day Care	3	1	4	2	3	5
	<b>Total</b>	<b>9</b>	<b>13</b>	<b>22</b>	<b>15</b>	<b>13</b>	<b>28</b>
Bike (ppl/hr)	Senior Housing	0	1	1	1	0	1
	Adult Day Care	0	0	0	0	0	0
	<b>Total</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>1</b>
Walk (ppl/hr)	Senior Housing	3	5	8	6	4	10
	Adult Day Care	1	1	2	1	2	3
	<b>Total</b>	<b>4</b>	<b>6</b>	<b>10</b>	<b>7</b>	<b>6</b>	<b>13</b>

The proposed project is expected to generate fewer than 25 net new inbound or outbound vehicle trips during the peak hours. Based on these projections, a more in-depth Comprehensive Transportation Review (CTR) and vehicular capacity analysis was not required because the impacts were expected to be minimal.

### Multi-Modal Network Evaluation

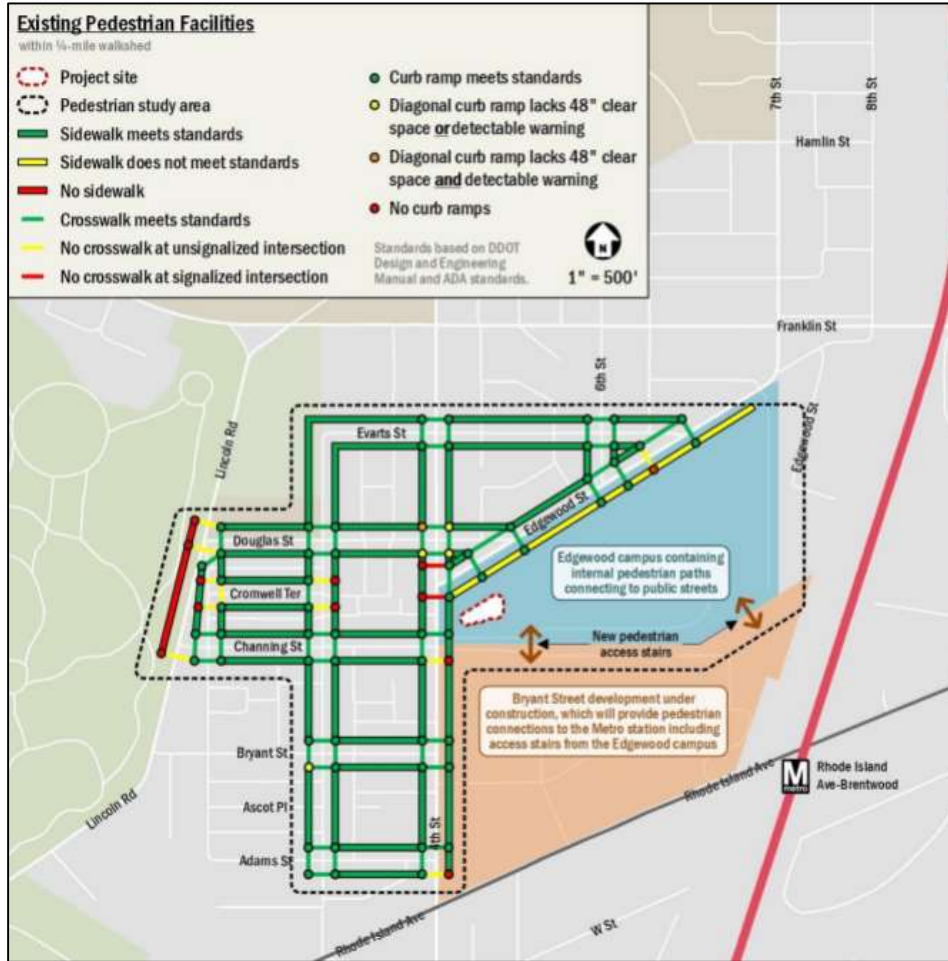
#### Pedestrian Network

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.

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, except for Edgewood Street. 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, especially given the pedestrian improvements that will be constructed as part of the Bryant Street redevelopment project south of the subject site.



Figure 4 | Existing Pedestrian Network (Source: Gorove Slade 9/24/2020 Transportation Statement, Figure 6)



To address some pedestrian safety issues, the Applicant proposes to provide pedestrian striping along several portions of the private drive south of the proposed development (see Exhibit 23A1). The Applicant will also construct one crosswalk that connects the proposed development to the stairs that will be constructed as part of the Bryant Street NE project south of the site (LTR 2017-02). This will provide greater connectivity to the Rhode Island Avenue-Brentwood Metro Station. DDOT requests the Applicant also construct curb ramps at both ends of the crosswalk, if not completed by others, to ensure as many people as possible, of all ages and abilities, can access the future staircase.

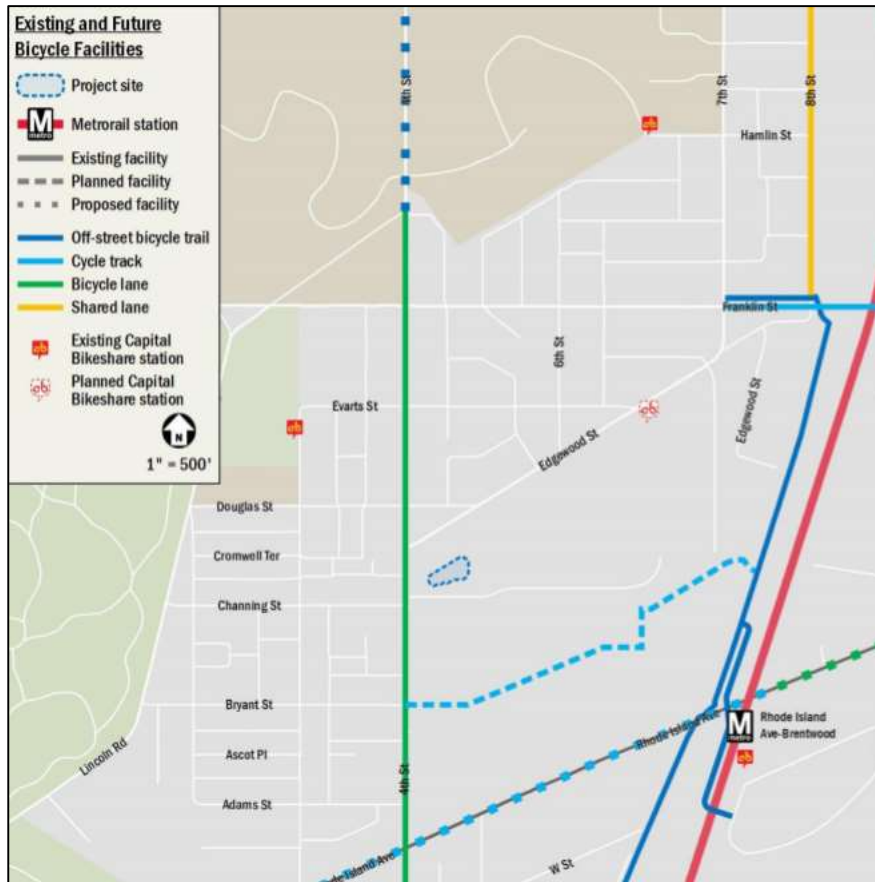
Bicycle Network

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. As shown below in Figure 5, the site is

directly adjacent to one bicycle lane on 4<sup>th</sup> Street NE and within a short distance to the Metropolitan Branch Trail.

The Bryant Street development immediately to the south of the Edgewood V Senior Residential site will include a new east-west cycle track connecting the existing 4th Street bicycle lanes with the Metropolitan Branch Trail. An interim version of this cycle track is scheduled to open in 2021, while the ultimate version is scheduled to open in 2026. MoveDC, the District’s long-range multimodal transportation plan, also proposes a cycle track along the segment of Rhode Island Avenue near the proposed development. The implementation timeline for this project is unknown.

**Figure 5 | Existing Bicycle Facilities (Source: Gorove Slade 9/24/2020 Transportation Statement, Figure 4)**



Transit Service

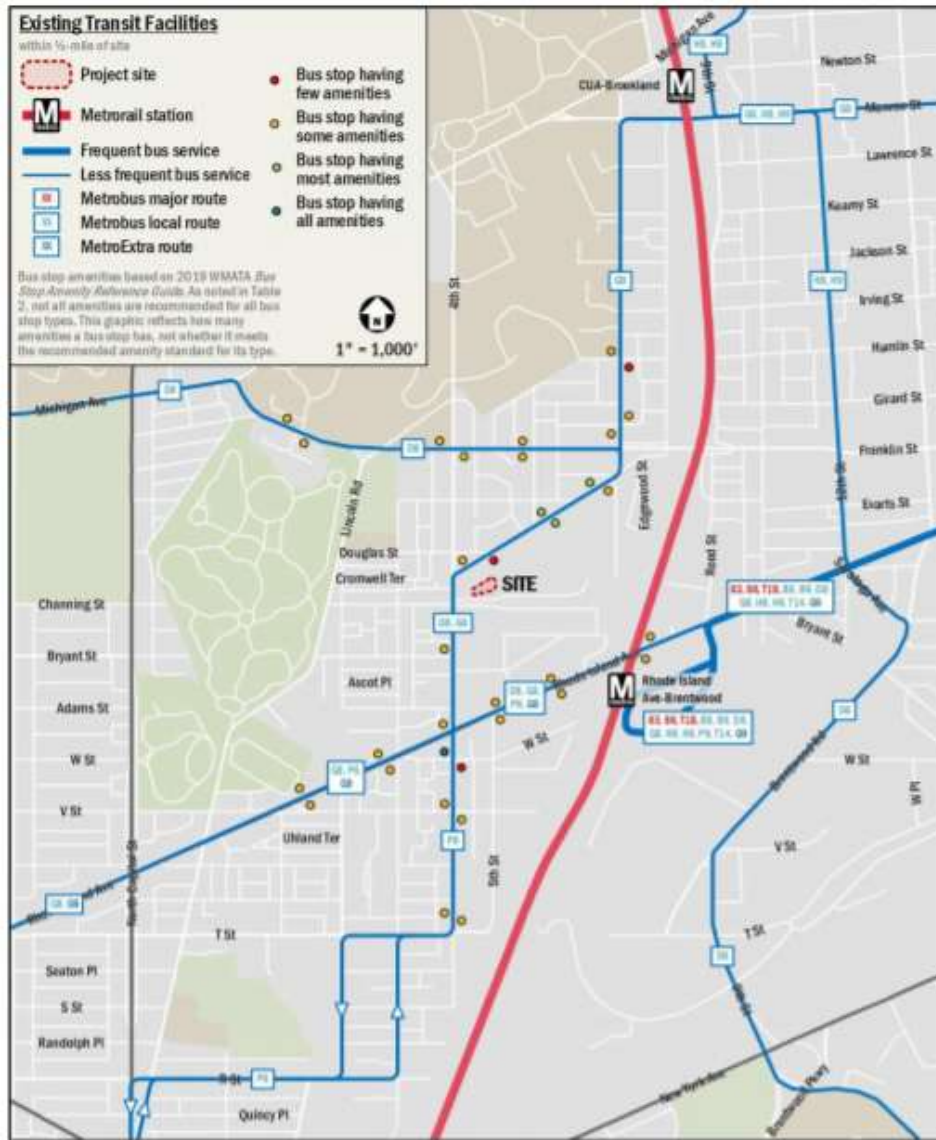
The District and Washington Metropolitan Area Transit Authority (WMATA) have partnered to provide extensive public transit service in the District of Columbia. DDOT’s vision is to leverage this investment to increase the share of non-automotive travel modes so that economic development opportunities increase with minimal infrastructure investment.

The site is located approximately 0.4 miles, roughly a nine-minute walk, from the Rhode Island Avenue-Brentwood Metrorail station which is served by the Red Line. Once the Bryant Street redevelopment has completed and the staircases have been constructed, the walking distance will reduce to approximately

0.25 mile. Trains serve the Metrorail station every four (4) minutes during weekday peak hours, six (6) to 12 minutes during weekday non-peak times, and six (6) to 15 minutes on weekends.

The site is served by several local bus routes along Rhode Island Avenue, 4<sup>th</sup> Street, and Edgewood Street NE with multiple bus stops located within a ¼-mile of the site. As shown by Figure 6, the transit study area for this project is served by nine (9) Metrobus lines carrying 12 designated routes.

**Figure 6 | Existing Transit Facilities (Source: Gorove Slade 9/24/20 Transportation Statement, Figure 3)**



## 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.

#### 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 September 24, 2020 Transportation Statement which includes the following elements:

- The Applicant will identify Transportation Coordinators for the planning, construction, and operations phases of development, who will act as points of contact with DDOT, goDCgo, and Zoning Enforcement;
- The Applicant 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;
- The Applicant will ensure Transportation Coordinators develop, distribute, and market various transportation alternatives and options to the residents, including promoting transportation events (i.e., Bike to Work Day, National Walking Day, Car Free Day) on the property website and in any internal building newsletters or communications;
- The Applicant will ensure Transportation Coordinators receive TDM training from goDCgo to learn about the TDM conditions for this project and available options for implementing the TDM Plan;
- The Applicant will provide welcome packets to all new residents and staff that, 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;

- The Applicant will ensure the Transportation Coordinator subscribes to goDCgo’s residential newsletter;
- The Applicant will post all TDM commitments on the development’s website, publicize availability, and allow the public to see what commitments have been promised;
- The Applicant will install a Transportation Information Center Display within the lobby of the facility that contains information related to local transportation alternatives;
- The Applicant will provide links to CommuterConnections.com and goDCgo.com on property websites; and
- The Applicant will distribute information to employees 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.

DDOT finds the proposed TDM plan to be sufficiently robust for this project and to offset the reduction in long-term bicycle parking.

AC:kv