



**WELLS + ASSOCIATES**

**MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**CC:** Alicia Knight, The George Washington University  
Charles Barber, The George Washington University  
David Avitabile, Goulston & Storrs

**FROM:** Jami L. Milanovich, P.E.  
Amber N. Mikec, P.E.

**DATE:** November 29, 2012

**RE:** Transportation Performance Monitoring Plan  
The George Washington University – Site 75A Redevelopment (ZC Case #06-11G/12G)

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In response to DDOT’s request, the George Washington University has developed an on-going performance monitoring program for the Site 75A redevelopment. One of the key elements requested by DDOT is the establishment of trip generation goals for the proposed redevelopment. In other words, the actual trip counts as measured at the site’s garage access after stabilization of the development would be compared to a pre-determined trip generation goal. If the goal is not met, the Developer would then be required to implement additional transportation demand management (TDM) measures. Since DDOT does not have a standard protocol for determining trip generation goals for performance monitoring programs, it is critical to come to an agreement on what the trip generation goals should be. The traffic impact study conducted by Wells + Associates (W+A) used trip generation methodologies consistent with DDOT guidelines for conducting traffic impact studies. Specifically, DDOT’s Design and Engineering Manual states, “Trip generation must be calculated from the latest data contained within the Institute of Transportation Engineers’ Trip Generation report or other industry publications such as the ITE Journal.” Consistent with standard practice in the District, W+A also included a non-auto mode split reduction given the site’s proximity to the Foggy Bottom – GWU Metro Station and the prevalent transportation options available near the site. In testimony at the November 15, 2012 hearing, DDOT cited the 2005 WMATA Ridership Survey as “one of the best efforts...in the country on ridership.” W+A examined the 2005 WMATA Ridership Survey and determined that the proposed office building could achieve a potential transit reduction of 33 to 36 percent based on its location with respect to the Foggy Bottom – GWU Metro Station. The W+A study assumed a reduction of 50 percent from the baseline ITE trip generation estimates (a reduction 14 to 17 percent higher than the WMATA Ridership Survey estimates).

DDOT has suggested an appropriate trip generation goal of a 75 to 80 percent reduction from the baseline ITE trip generation estimates. DDOT has not provided any support or justification for this trip generation goal, which far exceeds the WMATA Ridership Survey as well as W+A’s assumptions.

Although we believe that the trip generation estimates provided in the traffic impact study conducted for the Site 75A redevelopment are appropriate based on established methodologies and available data, the University, in an effort to compromise with DDOT, proposes a trip generation goal based on a 65 percent reduction from the baseline ITE trip generation estimates. This is 15 percent higher than the reduction assumed in the W+A traffic impact study and 29 to 32 percent higher than the WMATA Ridership Survey estimate cited by DDOT. This proposed trip generation goal, which exceeds that evaluated in the traffic impact study, is based on the University's agreement to reduce the number of parking spaces by 14 percent compared to that assumed in the traffic impact study.

The proposed vehicle trip generation goals are shown in Table I below:

Table I  
Proposed Vehicle Trip Generation Thresholds

LAND USE	PM PEAK HOUR		
	In	Out	Total
Total Trips per ITE Trip Generation Manual Land Use Code 710 (General Office)	62	303	365
<i>Non-auto Trips (65 percent)</i>	<i>40</i>	<i>197</i>	<i>237</i>
<b>Vehicle Trips</b>	<b>22</b>	<b>106</b>	<b>128</b>

The University's proposed monitoring program is outlined below:

- A. The Developer, upon stabilization of the development,<sup>1</sup> shall conduct an annual monitoring study of inbound and outbound vehicle trip generation for the site at the garage access for the PM peak hour of the adjacent street as follows:
  1. Traffic counts will be conducted when DC Public Schools, George Washington University, and Congress are in session.
  2. Counts will be conducted on three typical, weekdays (a Tuesday, Wednesday, and/or Thursday) from 4:00 PM to 7:00 PM.
  3. A traffic count of the total volume of traffic on the 2100-block of I Street NW (i.e., the street adjacent to the garage access) will be conducted on each of the count days to determine the one hour with the highest traffic volume. For purposes of determining the peak hour, the count data for the three days will be averaged and the four highest consecutive 15-minute intervals will determine the peak hour of the adjacent street.
  4. A traffic count simultaneously will be conducted at the entrance to the Site 75A garage (located in the public alley).

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<sup>1</sup> For purposes of this monitoring program, Stabilization is assumed to be reached once the office use reaches 80% occupancy.

5. The total vehicle trip generation (inbound plus outbound trips) for the PM peak hour of the adjacent street will be determined by examining traffic count data at the garage entrance for the one hour determined to be the peak hour of the adjacent street (per Item A.3) for each of the days counted. Driveway counts will then be averaged over the three days to determine the number of trips generated by the site.
- B. A copy of the study shall be submitted annually to DDOT (no later than June 15<sup>th</sup> each year) for a minimum of two consecutive years.
- C. In the event that the average PM vehicle trip generation determined per Item A.5 is less than 110 percent of the established vehicle trip generation thresholds identified in Table I for two consecutive years, monitoring may cease and the Developer's obligations will be considered fulfilled.
- D. In the event that the average PM vehicle trip generation determined per Item A.5 exceeds the established vehicle trip generation threshold identified in Table I by 10 percent or more, the Developer will continue to perform the monitoring until the vehicle trip generation for the site is determined to be less than 110 percent of the established vehicle trip generation threshold for two consecutive years.
- E. If the PM vehicle trip generation threshold is not met for two consecutive years within the first three years of monitoring, the Developer will conduct surveys of office employees to determine current PM peak period transportation modes in order to implement additional incentives to encourage alternate modes of transportation or travel during off peak time periods. The Developer then will submit an updated Transportation Demand Management (TDM) plan to DDOT based on such survey results within 90 days of submittal of the monitoring report.
- F. DDOT will review and provide comments to the Developer on the updated TDM plan within 60 days of its receipt so that the Developer may have adequate time to implement said plan prior to the next submission of the monitoring study (which is required to be made no later than June 15<sup>th</sup>). If DDOT does not provide written comments or indication that the updated TDM plan is acceptable within the 60 day time limit, the Developer will implement the updated TDM plan as submitted.
- G. The Developer will be required to continue extending this monitoring protocol for up to six years until it reaches the established trip generation threshold (less than 110 percent of the PM vehicle trip generation shown in Table I) for two consecutive years.
- H. If after six years the Developer is unable to show that the site is generating less than 110 percent of the established trip generation thresholds for two consecutive years, so long as the Developer has fully implemented the updated TDM plan identified in Section F, above, the Developer's obligation to monitor the vehicle trip generation of the site will be considered fulfilled and the Developer shall bear no further obligation under this agreement.