

Attachment 1

PenPlace Transportation and Traffic: Neighboring Communities' Concerns, Issues and Proposed Action Plan

April 18, 2013

Traffic Impact Analysis (TIA) and Neighborhood Traffic Study

- The PenPlace TIA relies on a robust and aggressive Transportation Demand Management (TDM) program to reduce the number of daily trips to and from PenPlace from 16,800 to 6,800 (a 60% reduction).
- An additional 6800 trips a day stresses existing infrastructure including already failing intersections slightly beyond the scope of the TIA but integral to access to PenPlace (e.g., S. 23rd and Jeff Davis Hwy). The TIA evaluates only a single scenario, based on the applicant's proposal, without any contingency analysis and that represents a best case scenario, not a "most likely" analysis. If the TDM program achieves only 50% reductions (which still represents a challenging program), the number of trips would increase to 8400.
- No contingency analysis has been done to evaluate the impact of a less than fully successful TDM program. The 6800 trips has been latched onto as if it were verifiable fact rather than an analytical construct. It would not have been that difficult to analyze a range of outcomes depending on the level of TDM achievement which would have provided a more realistic picture of the possible impact to the community.
- The community has no protection if the expected TDM reductions are not achieved. As noted above, the potential consequences to the community will be severe. However, there are no consequences to the developer for failing to meet the TDM goal. It's a one way bargain – by accepting this limited traffic analysis, the County is asking the community to sign up to live with the results of the TDM program but is not enforcing it, except through monitoring activities, with the developer.
- This level of uncertainty in the traffic analysis, which is built into the County planning process, represents an open-ended and unacceptable risk to the community. Therefore, we are proposing a TDM condition to be used in this and all future developments resulting from the Pentagon City PDSP and the Crystal City Sector Plan. This condition would establish developer accountability for the success of the TDM program and may also promote more realistic future traffic analyses which could result in better planning decisions.
- Other comments:
 - The TDM program places great reliance on redistributing trips to Metro but does not account for the reductions in Blue Line service, Metro's limited capacity for growth due to lack of rolling stock and quality control issues, and the deterioration of the overall

Metro experience. The County keeps insisting that, despite development, neighborhood traffic volumes have held steady or decreased due to Metro usage. But during that time frame, Metro had much more significant growth capacity to absorb the increased traffic than it does now.

- The Vornado neighborhood traffic study relied on run times to determine there was little-to-no time advantage to cutting through neighborhood streets rather than staying on the arterials. However, the incremental time differences were small. The commuting public will not have access to Vornado's study. However, they will have direct and immediate access to real-time Google and Garmin data, which will tell them that taking neighborhood streets may be a reasonable alternative.

22202 Context

- Developments in the Jeff Davis Corridor, whether in Pentagon City or Crystal City, share many of the same access and egress points (e.g., Jeff Davis Hwy, I-395, Glebe Rd., Army Navy Dr.).
- Developments in the Jeff Davis Corridor use the same Metro stations.
- Traffic analyses for individual site plans, no matter how large, are limited in scope, covering only nearby intersections, even if the sites use the same roads. Example – the TIA for 1900 Crystal Dr. cited Jeff Davis Hwy and S. 23rd St. as a failing intersection while the PenPlace TIA doesn't address that intersection at all even though it will be a critical access point to PenPlace.
- From an analytical standpoint, this overlap is supposedly subsumed in the 1% background growth figure used in the analysis. The 1% background growth figure used in the TIA seems small when considering the specific growth expected in Crystal City, Pentagon City and Potomac Yard.
- For each individual site plan, the traffic analysis and impact of TDM on Metro may seem reasonable. But no analysis has been or is being done to assess the cumulative impact of the potential traffic increases on the few key roads in the Jeff Davis Corridor and the cumulative impact of increased Metro ridership. Nor has there been any adjustment to the TDM analysis to reflect Metro's reduced Blue Line service to the Jeff Davis Corridor stations.
- The County's TDM policy emphasizes parking management rather than parking availability. Parking costs and preferences for non-SOV vehicles are considered but not the sheer number of spaces available. Parking ratios are formula-driven rather than being adapted to the circumstances of specific developments and neighborhoods. Availability of parking in nearby sites is generally not considered in TDM planning. Excess parking spaces both on site and nearby can undermine the effectiveness of the TDM program.
- The Crystal City Sector Plan established a goal of limiting traffic growth to 5%. To date, no effort has been made to define how this will be measured and no baselines have been established.

- The community asks the County to confirm verbal assurances that the 5% growth rate goal established in the CCSP also applies to the entire Jeff Davis Corridor since the streets being used are the same whether the destination is Crystal City or Pentagon City.
- The community asks the County to confirm that the additional traffic baselines requested January 15, 2013, have been added.
- The Crystal City Citizens Review Council was charged with developing performance measures to evaluate progress of the CCSP, including traffic measures. To date, the work to establish measures, methods and baselines has not begun. Meanwhile, site plans and PDSP's continue to be proposed and acted upon with no ability to assess the cumulative impact on the community.

Proposed Action Plan

Underlying all the proposed actions that follow is the need for the County to take a more holistic approach to transportation across the 22202 area. The County should develop a plan that encompasses the kinds of real-time monitoring, measuring of key metrics and goal setting described below. The piecemeal approach of individual site plan TIA's and one-shot studies such as the Crystal City Multimodal Plan is not sufficient to address the dynamic nature of development-related traffic growth and change expected throughout the 22202 area over the next 20 to 30 years.

- TDM should be translated into an enforceable performance goal prior to County Board action on the Pentagon City PDSP, Site Plan #105 - PenPlace PDSP, any subsequent individual site plan approvals for PenPlace, and any subsequent site plan approved for Pentagon City and the CCSP. The performance goal must align with the TDM ratio in the related Traffic Impact Analysis. (See Attachment 2 for proposed language).
- The County should incorporate parking availability on site and at nearby sites as an integral part of TDM program development and evaluate the impact of parking availability on the success of TDM program outcomes. The County should consider reduced parking ratios (as in the Rosslyn Plaza PDSP) as a part of TDM planning.
- Specific growth rates for the Jeff Davis Corridor, including neighboring Potomac Yard, need to be developed to evaluate whether the nominal 1% used in traffic analyses is reasonable.
- To facilitate traffic monitoring, analysis, reporting and control, installation of automated, real-time traffic monitoring and control capabilities should be accelerated at critical locations in the Jeff Davis Corridor or 22202 area. The associated management and reporting capabilities required to analyze traffic data, exert timely control and report traffic conditions to the community should be similarly accelerated. A site plan condition should be included asking the developer to contribute to the acquisition, installation and maintenance of this capability.

- Traffic data should be disseminated in real time when possible and as soon as reasonable for data that requires manual analysis. Current traffic data must be available on-line and in accordance with agreed-upon publication deadlines.
- A deadline for the development of traffic performance measures should be established. If the CCCRC does not want to assume this responsibility, then a team from the County, developer, and community should be established to carry this out.
- Potential traffic mitigation strategies, including funding sources, should be identified before County Board action on the Pentagon City PDSP, Site Plan #105 – PenPlace, so that quick action can be taken if it appears from monitoring performance goals that the TDM projections from the traffic analyses are not bearing out or that the 5% traffic growth rate cannot be met. The County should identify how tools such as placing a moratorium on additional densities, capping parking both prospectively and retroactively when TDM goals are not being met, limiting street access, adding bus service, etc. could be implemented in CC/PC to slow traffic growth.
- The County should establish criteria for thresholds and specific actions to be taken if volume approaches thresholds, i.e., if volume growth is approaching 4.7%, what is the plan?
- The County should create a formal written plan with a process for monitoring and addressing transportation needs in the 22202 area in a holistic fashion. The preceding eight action items would be an integral part of that plan.

Attachment 2

Proposed TDM Condition

An overall TDM goal of a 60% reduction is hereby established for the PenPlace PDSP. Individual site plans approved for PenPlace shall also have TDM goals as appropriate for the type of building – 65% for hotel and 56% for office – and shall include a condition substantially similar to this. The developer, County and community representatives shall meet to develop a TDM performance measurement plan including measurement strategy, baseline, data needed and tools. The TDM measurement plan must be approved by the County before any individual PenPlace site plans are approved.

The goals must be met within two years of initial occupancy of each building. Further, TDM performance shall be reviewed every two years for each building and for PenPlace overall to ensure the goals are continuing to be met. Failure to meet the goal (plus or minus 3 percentage points) shall require a corrective action plan from the developer within three months of the findings describing what actions the developer and county need to take to remedy the issues and shall require that TDM be measured annually until the goal is achieved. Corrective action shall include financial contributions from the developer to carry out needed actions. If the TDM goal for a particular building is exceeded by 3 percentage points or more, the measurement cycle for that building may be lengthened for one year each time the goal is exceeded – however, the measurement cycle may never go beyond 5 years.