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February 22, 2011

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VIA HAND DELIVERY

Mr. Anthony Hood, Chairman
Zoning Commission
441 4th Street, NW, Suite 210
Washington, DC 20001

Re: **Z.C. Case No. 06-11A/06-12A**
GW Foggy Bottom Campus Plan / PUD – Square 103
Post-Hearing Statement of the University

Dear Chairman Hood and Members of the Commission:

At the close of the public hearing in the above-referenced case on February 3, 2011, the Commission directed the applicant, The George Washington University ("University"), to examine whether the vehicular entrance to the proposed parking garage should be relocated from the public alley to G Street NW or, alternatively, other options to address pedestrian traffic such as whether the alley should be converted to one-way operation. The Commission also asked the University to consider whether additional measures were needed to address pedestrian traffic under the original proposed access plan from the public alley.

As discussed in detail below, the University has comprehensively studied the impact of relocating the garage entrance to G Street NW as well as converting the alley to one-way traffic, and has concluded that these changes would impose adverse impacts on building design, adjacent historic properties, and vehicular and pedestrian circulation. These adverse impacts far outweigh the more limited impacts presented by the original design with access from the alley open to two way traffic. Accordingly, the University believes that the two-way use of the existing alley is the preferred solution. In addition, the University has considered additional pedestrian safety measures at the alley intersections under the original design in consultation with OP and DDOT, and now proposes several specific new measures that are detailed below.

ZONING COMMISSION
District of Columbia

CASE NO. 06-11/06-12A

EXHIBIT NO. 06-11/06-12A

I. Study of G Street Entrance as an Alternative

A. Location of the G Street Entrance

As shown on the plan attached as Exhibit A, if the garage entrance were to be located on G Street NW, it would need to be located at the northeast corner of the Property, adjacent to historic rowhouses at 2000-2004 G Street NW. (See A3.)

The location of the entrance is dictated by DDOT design guidelines and the dimensions of the lot. The entrance could not be located at the western end of the Property, adjacent to Quigley's, because the garage entrance would be only 48 feet from the intersection of 21st and G Streets NW. This violates DDOT guidelines that call for driveway entrances to be at least 60 feet from the nearest intersection.¹ Furthermore, as a practical matter, more than 60 feet would be needed to provide for adequate queuing along G Street for vehicular traffic exiting the site.

Additionally, the entrance could not be located midblock for design reasons related to the dimensions of the lot. A midblock entrance would not provide enough distance for the ramp to slope downwards through the lower level of program space to the first floor of parking without requiring extensive and inefficient ramping with multiple turns. Additionally, a midblock entrance would break up the ground floor and lower level floor plate, which would effectively bifurcate these two floors into separate buildings and adversely impact the future building design including, in particular, the G Street facade.

B. Adverse Impacts Associated with the G Street Entrance

1. Design Impacts

As shown on the plans attached as Exhibit A, the G Street garage entrance would have adverse design impacts both on the site itself and on adjacent historic properties. The location of the garage entrance on G Street would place the covered ramp structure, rather than the planned interim green space, at the sidewalk edge. (See A3.) Furthermore, the resulting curb cut would eliminate some on-street parking as well as an existing street tree. (See A4.) And the garage entrance would continue to be located at the front of the building when the phase 2 improvements are completed, therefore precluding any effort to locate a more pedestrian-friendly design and use along that portion of G Street.

Moreover, the G Street location would be adjacent to and incompatible with the historic rowhouses at 2000-2004 G Street NW. (See A6 – A9.) Note that these townhouses feature stoops immediately adjacent to the garage entrance that are part of the historic fabric of the building and cannot be removed.

¹ Source: Section 31.2.3.1 of the DDOT Design and Engineering Guidelines.

2. Adverse Transportation Impacts

The University directed its traffic expert to undertake a comprehensive assessment of two alternative designs – the G Street garage entrance and a one-way alley configuration. The expert's assessment and analysis is included as Exhibit B. The report concludes that a G Street alternative would lengthen the vehicular circulation pattern for cars exiting the property and would also result in twice as many potential pedestrian-vehicular conflicts at surrounding intersections. The report also finds that these potential conflicts would be more severe than conflicts at the alley intersection, because vehicles pass through the intersections at higher rates of speed.

Vehicular Impact Analysis

The attached analysis concludes that surrounding street intersections would operate at acceptable levels of service ("LOS") both under the original alley proposal and the G Street alternative. The analysis also finds that the move to G Street would decrease the delay for traffic exiting the new garage. Note, however, that the 21st Street and alley intersection would operate at a LOS "F" during the PM peak hour even with the relocation of the garage entrance to G Street due to the fact that the intersection is already at a LOS "E" with future background conditions.

While the move to G Street would decrease the delay for vehicular traffic leaving the garage, it would, however, result in a more circuitous path for these cars once they exit the garage, due to the one-way configuration of the surrounding road network. Under the original two-way alley design, cars can proceed directly to either northbound 20th Street or southbound 21st Street. Under the G Street alternative, cars heading southbound must first turn left onto G Street and then left again onto 21st Streets. Cars heading northbound must head left onto G Street and then circle around the block to get to 20th Street.

Based on this analysis, the traffic consultant concluded that the relocation of the entrance to G Street would not necessarily improve vehicular access because the reduced delay in exiting the garage would be offset by the increased travel time required to reach the primary north-south streets.

Pedestrian Impact Analysis

The traffic expert conducted pedestrian counts on the sidewalks immediately adjacent to Square 103, and found that there were higher levels of pedestrian activity along 20th and 21st Streets compared to G Street. Notwithstanding these counts, however, the analysis concluded that the G Street alternative would result in greater potential adverse impacts to pedestrians because it would double the number of potential pedestrian-vehicular conflict points on the surrounding street network and place them at higher-speed intersections rather than at the slow, pedestrian-dominated alley intersections.

First, since the public alley is an existing condition, it will not be removed even if the garage entrance is located on G Street. All that the G Street entrance would do is create an additional curb cut on the surrounding street grid, thereby creating an additional point for pedestrian-vehicular conflict.

Second, as shown on the diagrams included in the report attached as Exhibit B, the surrounding roadways all are one-way streets, and therefore any traffic exiting at G Street would need to make two left turns to travel southbound on 21st Street and four left turns to travel northbound on 20th Street. As a result, pedestrians would still encounter vehicular traffic associated with the site at these intersections.

Third, under the G Street alternative, the majority of the potential pedestrian-vehicular conflicts would occur at the signalized intersections, which is a less safe condition for pedestrians compared to the sidewalk crossings of the alley on 20th and 21st Streets. At the signalized intersections surrounding the block, pedestrians and vehicles making a left turn would have the green light / walk signal at the same time, therefore creating more potential for conflict and at higher vehicular speeds. At the alley intersection, however, pedestrians would have the clear right of way due to the configuration, width, and stop-controlled nature of the intersection.

Conclusion

For the reasons set forth above, the traffic consultant determined that the while the G Street alternative may have fewer conflicts at the garage curb cut versus the original two-way alley access scheme, it generates significantly greater potential for pedestrian/vehicular conflict when compared to the original design. Accordingly, the consultant concluded that the original two-way alley configuration was preferable to the G Street alternative.

II. Study of One-Way Alley Traffic as an Alternative

The University's traffic expert also analyzed the impact of converting the alley to one-way operation, such that all traffic would enter at 21st Street and exit at 20th Street. For many of the reasons discussed in detail above, the analysis concluded that the change would actually impose greater vehicular and pedestrian impacts due to the one-way circulation on the surrounding street grid. Again, vehicles exiting the site to head southbound would need to circle half the block in order to reach their primary route. Moreover, this circulation pattern would result in nearly double the number of potential pedestrian-vehicular conflicts due to the added conflicts as these vehicles pass through multiple intersections to reach their final southbound route.

III. Additional Pedestrian Safety Measures

For the reasons discussed above, the University has concluded that the original proposed two-way alley access continues to be the best site planning solution that will not have a negative or adverse impact on surrounding vehicular or the pedestrian networks. Under this proposal, the alley will be widened by the University from 16 feet to 20 feet to accommodate the two-way traffic. As a part of this effort, the University will relocate utilities and other alley features as needed.²

The University has, in consultation with OP and DDOT, restudied the alley intersections to determine whether additional measures could be implemented in order to reduce the potential for pedestrian-vehicular conflicts. Photographs of the existing conditions are included on pages A11 and A13 of Exhibit A and generally show that adequate sight distance is available at both intersections to see both pedestrians and vehicular traffic in conformance with DDOT guidelines.³

To further improve conditions, the University will improve the alley intersection with special paving materials to emphasize that a pedestrian crossing is ahead and that pedestrians have the right of way. These materials will include, as shown on A10 and A12 in Exhibit A:

- Scored concrete for the portion of the sidewalk crossing the alley intersection, in order to make the sidewalk readily visible to approaching drivers.
- Special alley paving materials that include:
 - **darker concrete immediately adjacent to the sidewalk** (this will contrast with the rest of the alley paving color as a visual cue to drivers) and
 - **stamped concrete** with a texture similar to that of cobble stone (effectively a gentle rumble strip 30 ft. in length to give the driver a tactile cue through the steering wheel and also an audible clue).

Together, these measures will serve as a visual, audible, and tactile warning to drivers that pedestrians are ahead and they should slow down.

- **A painted stop bar and related signage five feet from the sidewalk**, so that vehicles will stop before they reach the sidewalk and then proceed slowly once they start moving again. Note that the use of darker concrete for alley paving in this location will enhance the visibility of the stop bar.

² These changes were illustrated on the civil drawings included in Exhibit A of the original PUD application dated August 17, 2010.

³ Source: Section 31.2.3.1 of the DDOT Design and Engineering Guidelines. To this end, modifications to the stoop associated with building immediately south of the alley at 21st Street is unnecessary, and the additional measures discussed herein will address the safety of pedestrians traveling northbound. Note further that this condition (a stoop adjacent to the entrance) would occur even if the entrance was relocated to G Street, since a historic stoop is also located adjacent to that entrance alternative.

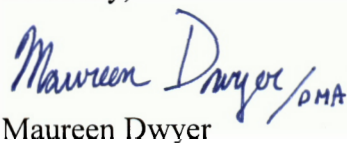
The measures above were selected based on discussions and input from OP and DDOT, and the final selection of materials and evaluation and installation of additional measures, if any, will be determined in consultation with DDOT during the public space permitting process.⁴

Again, these measures will further pedestrian safety and reinforce the message to drivers leaving the garage that pedestrian traffic has the right of way at the alley intersections. The measures provide additional controls to direct vehicles crossing through the intersections to stop before they approach the sidewalk and then proceed slowly before turning onto 20th or 21st Streets. Since a large number of these pedestrians are members of the University's population, it is of course in the University's best interest to ensure the safety of its students, faculty, and staff as well as its neighbors. To that end, the University will monitor the situation and respond appropriately if conditions warrant. The University will also provide the Commission with an update on the operation of these intersections when it comes forward with the second phase of the development of the Property, so that the Commission may have the opportunity to determine itself whether additional measures should be implemented.

Conclusion

On balance, the University continues to believe that the most optimal location for vehicular access is from the public alley. As set forth above and in prior submissions, the Project meets the criteria for approval under the Zoning Regulations. If you have any questions regarding this application, please feel free to contact Maureen at 202-721-1101 or David at 202-721-1137.

Sincerely,


Maureen Dwyer


David Avitabile

DA/da
Enclosures

cc: Charles Barber
Alicia O'Neil Knight

⁴ DDOT has reiterated that signalization of the alley intersection is unnecessary given the volume of traffic and would actually worsen pedestrian conditions because the wait time would take away the clear pedestrian right-of-way and encourage jaywalking.

CERTIFICATE OF SERVICE

On February 22, 2011, I caused a copy of the foregoing letter and enclosure to be delivered by hand or by U.S. Mail to the following:

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