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**MEMORANDUM
BY HAND DELIVERY**

To: Charles Thomas
Lewis Booker
[Signature]

From: Paul Tummonds *[Signature]*
Michael A. Weiss *[Signature]*

Date: April 26, 2007

Re: Stanton Square – PUD and Zoning Map Amendment Application (Z.C. Case No. 05-35)
Proposed Site Plan Addressing Compliance with DDOT's Design and Engineering Manual

On April 24, 2007, we sent you copies of a Traffic Impact Analysis prepared by O.R. George & Associates and additional copies of the pre-hearing statement for the above-mentioned project. As noted in those materials, Horning Brothers (the "Applicant") intends to dedicate the streets in this project to the District of Columbia. Enclosed please find a Site Plan (the "Plan") and a Graphic Street Section (the "Street Section") for the above-mentioned project. This memo highlights the areas in which the proposed project does not satisfy the strict requirements of the DDOT Design and Engineering Manual (the "Manual").

It is important to note that throughout the design process for this project, both the Office of Planning ("OP") and the Zoning Commission have stressed the importance of maximizing green space on the property and incorporating low-impact development ("LID") strategies into this project. The Zoning Commission specifically requested that the amount of asphalt on this site be minimized. The Applicant has sought to balance the sometimes contradictory requirements of the Manual and the guidance of OP and the Zoning Commission in designing this project. The Applicant believes that the proposed project provides a safe and efficient transportation system for residents of the townhomes and their guests, as well as creating an environmentally sensitive project that meets the planning and development goals for Ward 8 and the District of Columbia.

The proposed project does not satisfy the strict requirements of the Manual in the following areas:

1) Roadway Width

The upper portion of the Plan includes a two-way roadway with parking on one side (see (A) on the attached Plan), as shown in Section F:F. The Manual requires such a road to have a width of 32 feet, whereas the road as designed is 30 feet wide.



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This 2-foot non-conformity is very minor. Furthermore, the non-conformity will pose no new safety or other problems, because the roadway in question is extremely short and will handle no through traffic. It should be noted that the 32-foot regulation in the Manual is intended to encompass significant traffic arteries with faster-moving traffic including trucks and buses.

2) Sidewalk Width

The Manual establishes a minimum sidewalk width of 6 feet. As outlined in Sections A:A, B:B, C:C, D:D, E:E, and F:F of the Plan, the proposed sidewalks are 4 feet wide. The Manual's minimums are intended to apply to all streets in the District of Columbia, including heavily trafficked streets in the Downtown area. Given the residential nature of the project, and the fact that the sidewalks of the project are unlikely to carry significant foot traffic from outside the Stanton Square community, the 4-foot sidewalks on both sides of the streets provided by the project will be more than adequate to encourage and accommodate the projected pedestrian traffic.

3) Driveway Separation

The Manual requires that the distance between driveways be at least 28 feet. The project proposes distances between driveways of 6 and 8 feet for the front-loaded garage townhomes (see (B) on the attached Plan). The front-loaded garage townhomes have been introduced into the project to provide an additional unit type. These townhomes will have back yards and will provide additional greenspace for the entire project.

It is the Applicant's understanding that the Manual's requirement is intended to provide a "safety zone" for pedestrians walking along a sidewalk, such that they can safely pass individual driveways and have a chance to pause and make sure it is safe before proceeding across the next driveway. The Manual's requirement envisions driveways leading to parking garages containing hundreds of spaces that might have significant traffic at rush hour, or driveways leading to alleys containing numerous parking areas and service vehicles. It is also our understanding that the Manual's requirement is intended to allow for on-street parking spaces between drive-way entrances.

In this project, however, each driveway will lead only to the garage of one single-family home, which means that the danger to pedestrians posed by each driveway is minimal. A pedestrian walking along a sidewalk in this community will be able to easily discern whether a car is about to enter or exit one of the short driveways, and the 6- and 8-foot "safety zones" between the driveways will provide adequate space for pedestrians to pause for any driveway traffic.

In regard to the provision of additional parking spaces for residents of the townhomes and their guests, the front-loaded garage townhomes will provide adequate space for a car to be parked in the driveway of the townhome. These spaces have not been counted in the overall number of



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parking spaces provided in the project, but will be available for the residents of these townhomes. As noted in the Traffic Impact Analysis, the amount of parking provided in this project adequately complies with the requirements of the Zoning Regulations.

4) Right-of-Way Width

The Manual requires a one-way street to have a minimum right-of-way width of 55 feet, with an additional 10 foot setback on both sides of the street. A two-way street is required to have a minimum right-of-way width of 75 feet, with an additional 10 foot setback on both sides of the street. The proposed Plan includes rights-of-way, measured from the edge of the sidewalk on both sides of the street, that vary from 35-47 feet in width.

As noted above, this project has been designed in response to concerns and issues raised by OP and the Zoning Commission. The Applicant has taken a holistic approach to creating a community of 187 affordable and market rate townhomes with significant amounts of greenspace, a reduced amount of paved area, and significant LID components. The proposed streets are not intended to be connector streets and will never need to be widened. In addition, the Zoning Commission's approval of this PUD application dictates the location of the townhomes, all of the townhomes will be constructed in the locations as shown on the Plan. The Zoning Commission's approval of the Plan assures that a consistent streetscape will be maintained throughout the project. If the Applicant were required to satisfy the large right-of-way width requirements enumerated in the Manual, the proposed project would not be feasible.

5) Distance of Driveway Entrance from Street Intersection

The Applicant has been informed that the Manual requires a distance of at least 60 feet from all driveway entrances to a street intersection. The proposed project includes driveways that are located 54 feet, 38 feet, and 32 feet from the intersections of the new streets and Stanton Road (see (C) on the attached Plan). Due to the one-way and two-way street system that is proposed in this project, the Applicant believes that the proposed distances from the Stanton Road intersections to the driveway entrances do not create any adverse safety conditions.

CONCLUSION AND NEXT STEPS

Of the 187 townhomes in this project, 62 townhomes will be reserved as workforce affordable housing units. It is very important to the success of these affordable units that the monthly homeowners association fees be kept to a minimum. A significant measure that can be taken to maintain modest monthly homeowners association fees is to make the streets in this project public streets.

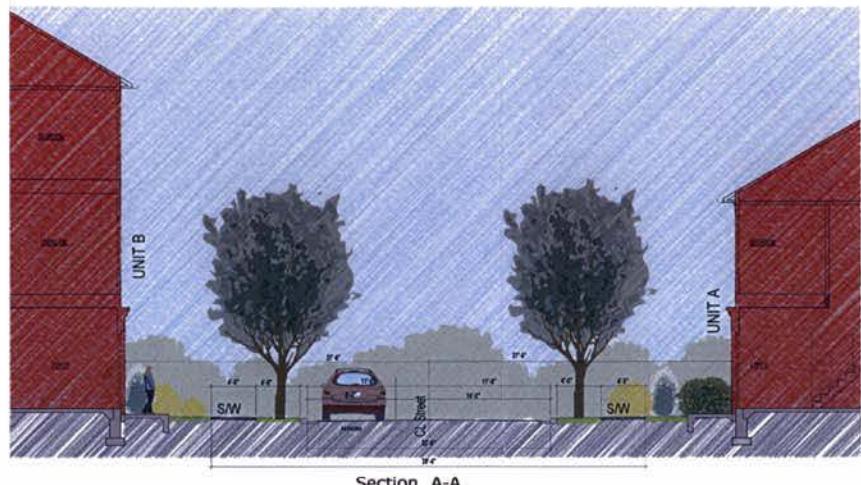


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The Applicant and its consultants would like to schedule a meeting as soon as possible with the appropriate DDOT representatives to review this application. Please contact us at your earliest convenience to schedule that meeting. Paul can be contacted at (202) 663-8873, and Mike can be contacted at (202) 663-9387.

Enclosures

cc: Karen Thomas, Office of Planning
David Roodberg and Robert Love, Horning Brothers
Osborne George, O.R. George & Associates
James McDonald, Lessard Group
Mary Ramsey, Edwards and Kelcey



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