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December 26, 2006

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VIA HAND DELIVERY

Ms. Carol Mitten, Chairperson
District of Columbia Zoning Commission
Office of Zoning
441 4th Street, NW, Room 210
Washington, DC 20001

704 DEC 26 2006 9:49 AM

DC. OFFICE OF ZONING

RECEIVED

Re: Zoning Commission Case No. 06-27, Square 54

Dear Ms. Mitten:

Pursuant to the Commission's requests during the November 20, 2006 hearing, the Applicant submits the following additional information for the record in the above-referenced case (the "Project"):

- Exhibit A: Renderings of the office component (from vantage points across Washington Circle and as a pedestrian on Washington Circle), and a rendering of the residential component of the Project, including the I Street retail plaza;
- Exhibit B: Height study diagrams identifying the zoning and measured height of the Project in relation to surrounding buildings, illustrating both existing and proposed conditions under the *Foggy Bottom Campus Plan: 2006 – 2025*;
- Exhibit C: A diagram of a modified curb cut on 22nd Street in response to a concern raised in DDOT's December 4, 2006 report (item #5). While the attached diagram presents one potential solution, the Applicant will continue to work with DDOT to fully resolve this issue;
- Exhibit D: Photographs of the material boards that the Applicant presented at the November 20, 2006 hearing;
- Exhibit E: A chart addressing grocery stores and accessory parking in the District and a diagram showing their locations and proximity to Metrorail stations;

ZONING COMMISSION
District of Columbia

ZONING COMMISSION

District of Columbia

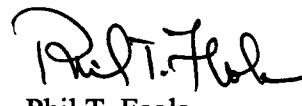
CASE NO. Oleg CASE NO. 06-27

EXHIBIT NO. 56

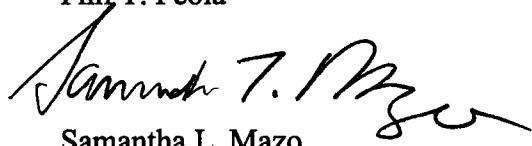
EXHIBIT NO. 30

- Exhibit F: Additional information regarding WMATA Ridership Survey modal splits; and
- Exhibit G: Proposed condition regarding Project construction and the proffered grocery store.

Sincerely yours,



Phil T. Feola



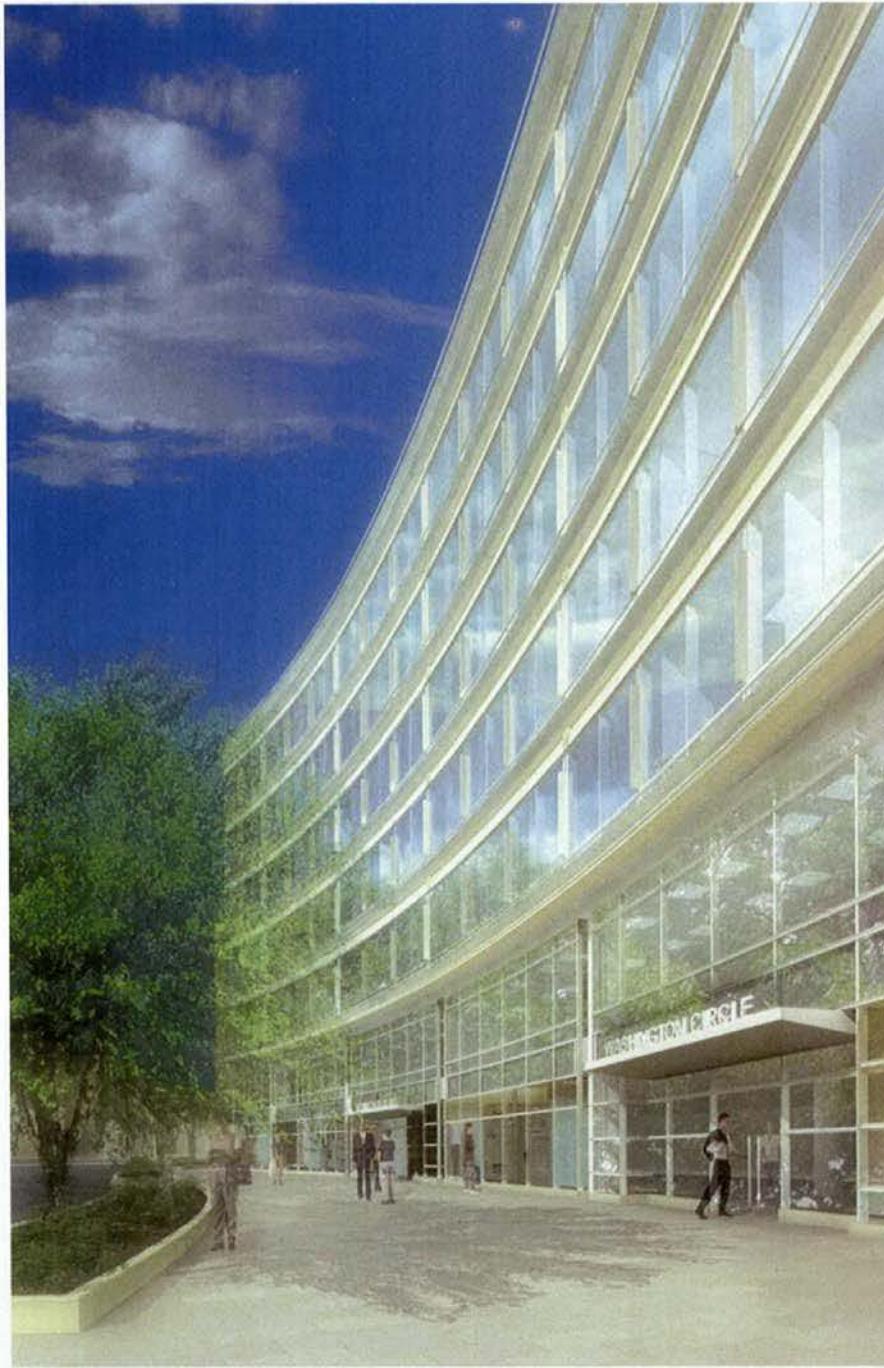
Samantha L. Mazo

Enclosures



VIEW FROM WASHINGTON CIRCLE

26 DECEMBER 2006



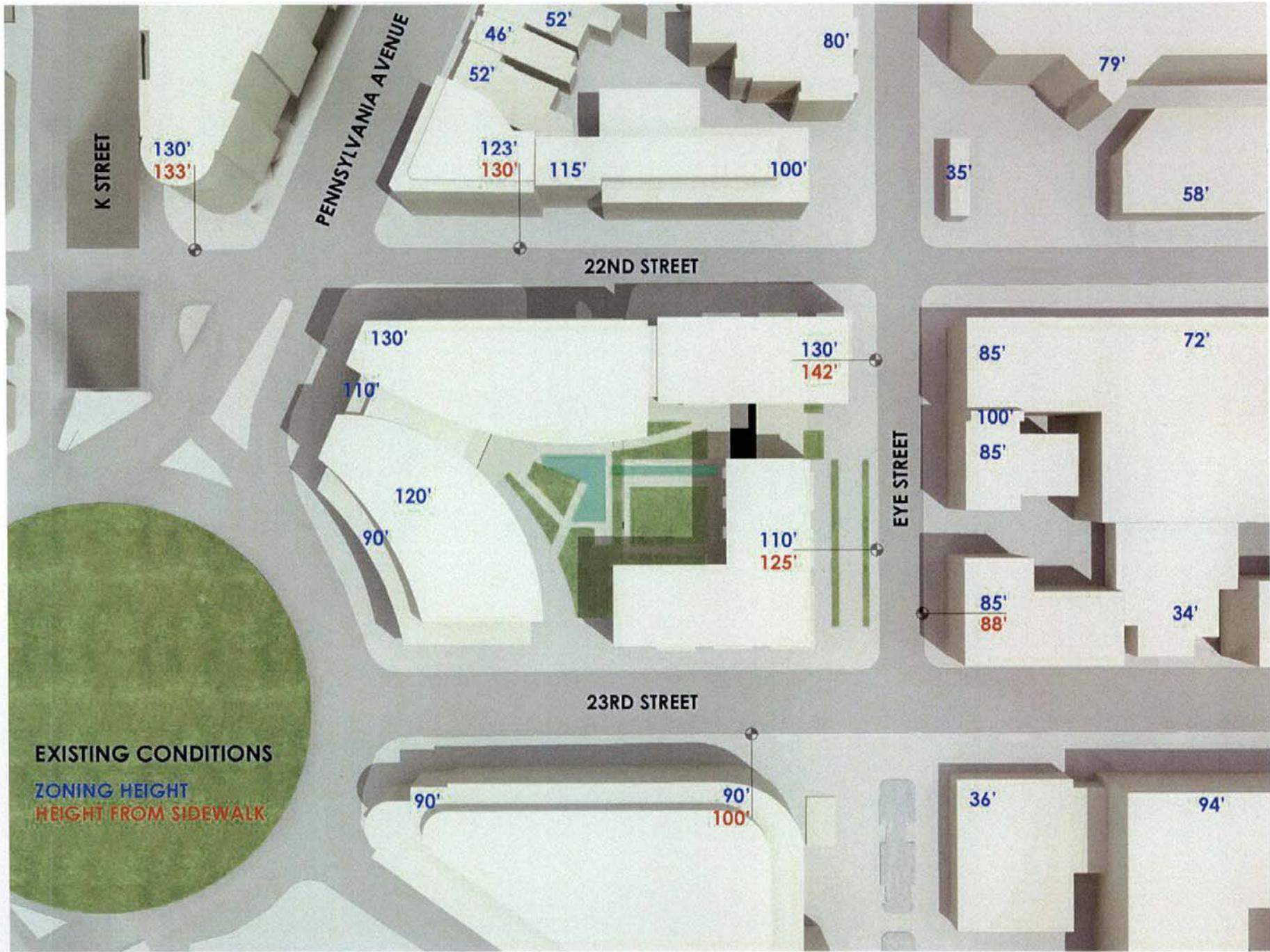
STREET LEVEL VIEW AT WASHINGTON CIRCLE

26 DECEMBER 2006



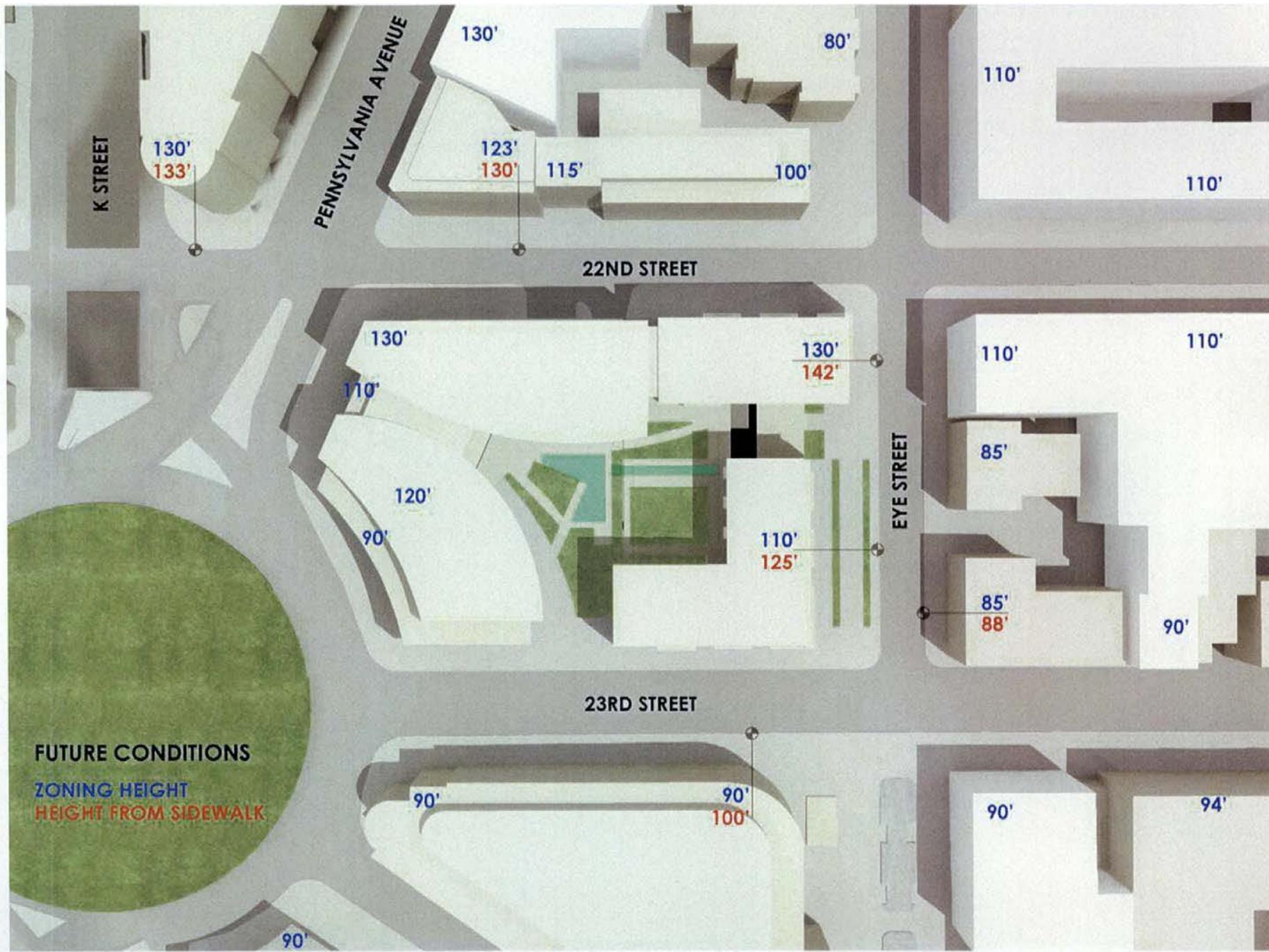
VIEW FROM 23RD STREET AND EYE STREET

26 DECEMBER 2006



HEIGHTS FROM SIDEWALK - EXISTING CONDITIONS

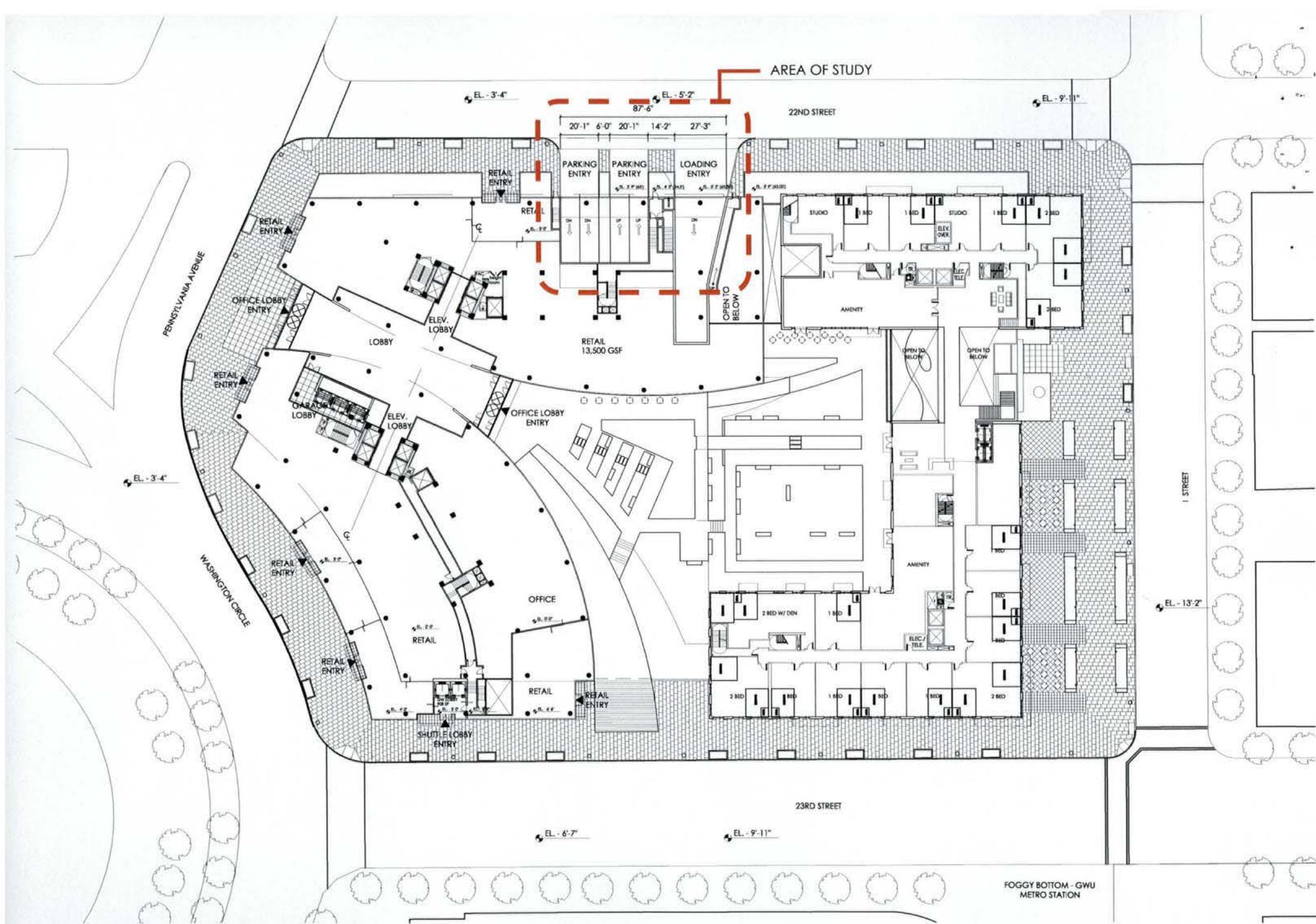
26 DECEMBER 2006



HEIGHTS FROM SIDEWALK - PROPOSED GW MASTER PLAN

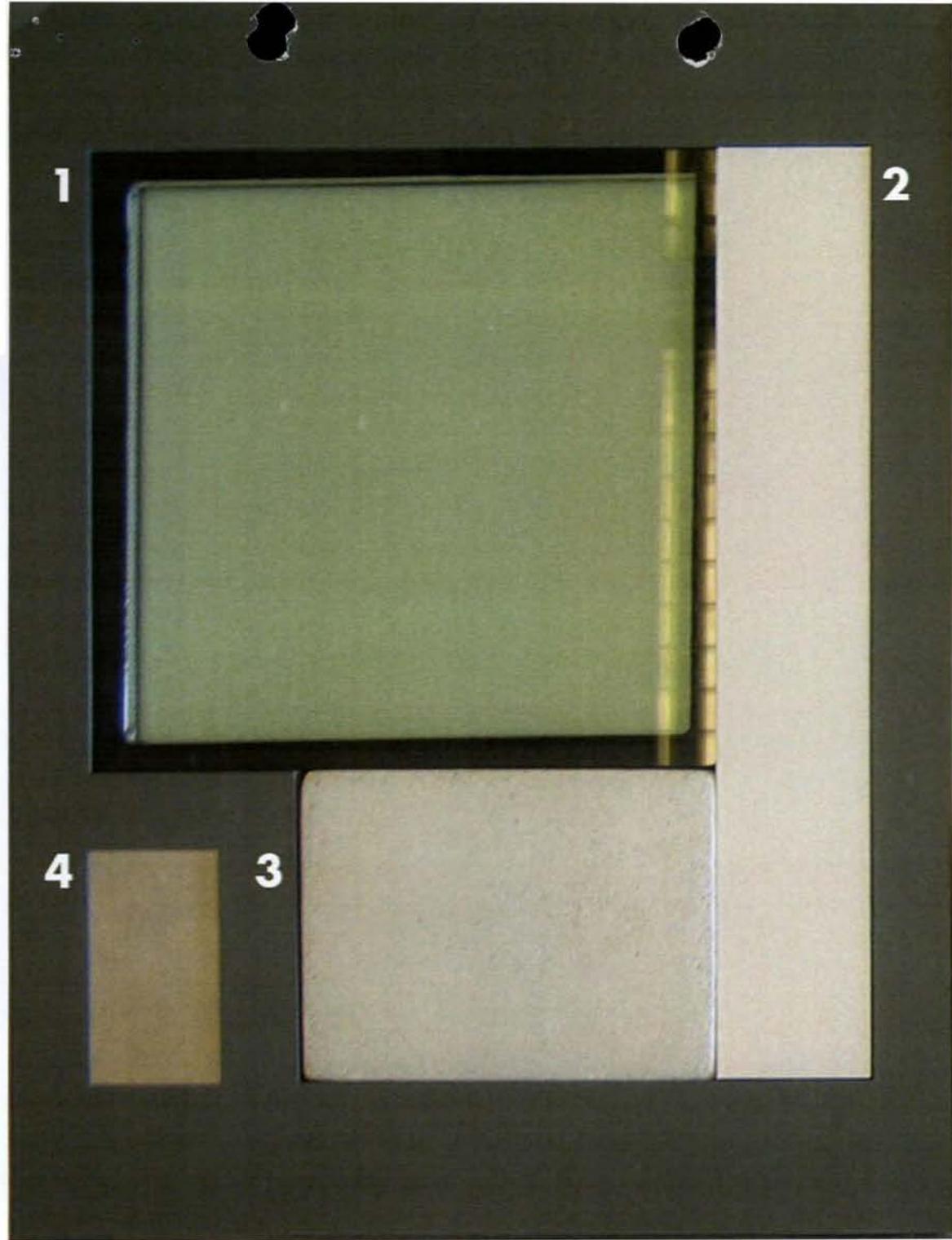
LOCATION OF SURVEYED CURB HEIGHT

26 DECEMBER 2006



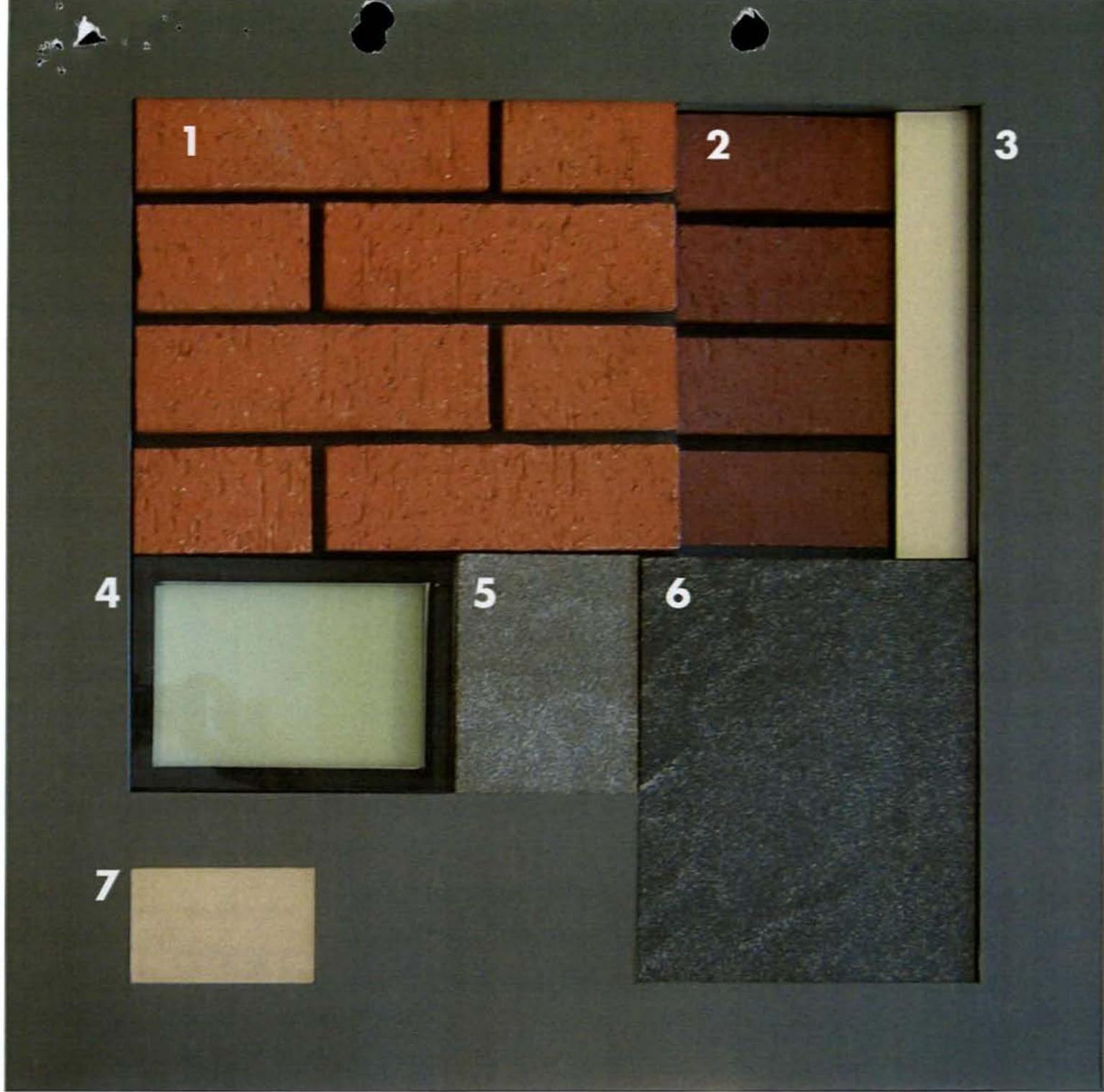
STUDY - 6'-0" PEDESTRIAN REFUGE AT PARKING ENTRY

26 DECEMBER 2004
SCALE: 1" = 64'-0"



COMMERCIAL BUILDING MATERIALS PALETTE

- 1 - LOW-E INSULATED GLASS**
- 2 - PAINTED METAL**
- 3 - STONE OR MASONRY**
- 4 - STAINLESS STEEL**



RESIDENTIAL BUILDING MATERIALS PALETTE

- 1 - ROSE TAN BRICK
- 2 - BURGUNDY BRICK
- 3 - PAINTED METAL
- 4 - LOW-E INSULATED GLASS
- 5 - STONE OR MASONRY
- 6 - STONE OR MASONRY
- 7 - STAINLESS STEEL OR BRUSHED ALUMINUM



WELLS & ASSOCIATES, LLC

TRAFFIC, TRANSPORTATION, and PARKING CONSULTANTS

MEMORANDUM

TO: District of Columbia Zoning Commission
FROM: Jami L. Milanovich, P.E.
DATE: December 21, 2006
RE: Square 54 PUD (Case No. 06-27)

At the hearing before the Zoning Commission for Case No. 06-27 on November 20, 2006, additional information was requested regarding the non-auto mode splits utilized in the Square 54 Transportation Impact Study. The non-auto mode splits utilized for the proposed Square 54 office and residential uses initially were determined based on information contained in WMATA's Development Related Ridership Survey II (JHK & Associates, December 1989). This document provides equations to determine the percentage of trips made by transit for various land uses. The transit mode share is dependent on the distance from the subject building to the nearest Metro station measured as a walkable route. For downtown office sites, the transit mode share is calculated as follows: $61.37 - 0.76^*M$ (Page 94); where M is the distance to the nearest Metro station in hundreds of feet. The Foggy Bottom – GWU Metro Station is approximately 250 feet from the Square 54 development. Therefore, the transit mode share for the Square 54 office component was calculated at 59.5%.

For residential sites, the transit mode share is calculated as follows: $66.52 - 1.56^*M$ (Page 102); where M is the distance to the nearest Metro station in hundreds of feet. Therefore, the transit mode share for the Square 54 residential component was calculated at 62.6%.

In March 2006, subsequent to submitting the revised Square 54 Transportation Impact Study (October 2006), the 2005 Development Related Ridership Survey was published. This study was reviewed to ensure that the non-auto mode splits derived from the 1989 Ridership Survey were still valid. Unlike the 1989 Ridership Survey, the 2005 Ridership Survey does not provide equations. Instead, the 2005 Ridership Study groups the surveyed sites into three concentric location typologies, which include "within the CBD", "suburban locations inside the beltway" and "suburban locations outside the beltway." The surveyed sites within the CBD are most comparable to the Square 54 site and are therefore the most appropriate for purposes of comparison.

Table 4, *Commute Mode Share at Office Sites by Concentric Location Typology*, (Page 23) of the 2005 Ridership Survey indicates that 63% of commuters surveyed at sites within the CBD utilize Metrorail, 12% utilize Metrobus or other transit, 5% walk or bike, and 21% travel via auto. Therefore, the 60% non-auto mode reduction assumed for the Transportation Impact Study as determined from the 1989 Ridership Survey would be considered conservative when compared to the more recent data.

Similarly, Table 10, *Residential Mode Share for All Trips by Concentric Location Typology* (Page 30), of the 2005 Ridership Survey indicates that 50% of residents surveyed at sites within the CBD utilize Metrorail, 6% utilize Metrobus or other transit, 26% walk or bike, and 18% travel via auto. Again, the 63% non-

auto mode reduction as determined from the 1989 Ridership Survey is conservative compared to the 2005 Ridership Survey data.

In response to a question raised by the Zoning Commission, a comparison of the office spaces in the 2005 Ridership Survey was conducted to determine if the class of office space at the surveyed sites impacts the non-auto mode split. Wells & Associates was able to determine the class of office space for 16 of the 17 sites surveyed. The following table displays the office sites, the class of office space and the non-auto mode split for the sites.

Office Class	Office Building	Non-Auto Mode Split
B	1634 I Street	83%
A	1701 Pennsylvania Avenue	75%
A	Metro Plaza 1	56%
A	333 John Carlyle	50%
B	Crystal Square 2	43%
A	Chevy Chase Plaza	43%
B	Reeves Center	42%
A	Courthouse Tower	40%
A	2100-2200 Clarendon Blvd.	30%
A	King Street Station	29%
A	8380 Colesville Road	25%
B	8720 Georgia Avenue	23%
A	3 Ballston Plaza	20%
A	Crystal Park IV	19%
A	Ballston One	16%
A	8400 Corporate Drive	11%

As shown in the table, the majority of the sites are Class A office buildings (i.e. 12 of 16). Furthermore, the non-auto mode splits for the Class B office buildings are not consistently higher or lower than the Class A buildings; rather, they are interspersed throughout the data set. Of note, the two office buildings with the highest non-auto mode splits, one Class A and the other Class B, are located in the CBD. The non-auto mode splits for these two CBD office buildings are higher than the non-auto mode split of 60% assumed in the study. Additionally, the office building with the lowest non-auto mode split (i.e. 8400 Corporate Drive) is located outside of the beltway and the remaining office sites are located inside the beltway, but not in the CBD. Based on this information, a significant correlation exists between the location of the office space and the non-auto mode split. Since the Square 54 site is in the CBD and is therefore most similar to the two office buildings with the highest mode splits, the 60% non-auto mode split assumed in the study should be easily achievable.

Additionally, in response to a comment raised by the Zoning Commission, Boston Properties conducted a study of the 13 largest law firms that currently lease space within their Washington, D.C. portfolio to determine how many of these law firms provide pre-tax transportation benefits to their employees. All 13 of the law firms contacted, which represents over 1.83 million rentable square feet of space, offer pre-tax transit incentives to their employees. This study furthers reinforces the validity of the 60% non-auto mode split assumption noted above.

Parking – Grocery Stores

Attached please find a parking chart for local grocery stores as requested by the Commission.

Also included is a map showing the locations of the listed grocery stores and their proximity to Metrorail stations.

Please note that the parking provided by the Applicant exceeds the requirements of the Zoning Regulations. The Square 54 grocery store will be located only 200 feet from a Metrorail station entrance, directly below an office-residential complex and adjacent to The George Washington University Foggy Bottom Campus. Further, unlike many of the stores on the chart, in addition to the 80 parking spaces that are specifically dedicated to the Project's retail, the Project will have an additional 310 commercial parking spaces available to service the retail patrons.

Table 1
Urban Grocery Store Parking Analysis

Store	Built/Planned	Location	Ward	Parking Supply (Spaces)	Size (Square Feet)	Parking Ratio (Spaces/1,000 S.F.)	Source	Comments
TBD	Planned	Square 715	6	121	53,300	2.27		
Trader Joe's	Built	The Columbia, L Street/25th Street	2	50	11,833	4.23	Trammell Crow	Built, ready for occupancy
Whole Foods	Built	1440 P Street	2	197	42,000	4.69	Wells & Assoc.	
Whole Foods	Built	Tenleytown 4530 40th Street	3	100	25,000	4.00	JBGR	
Giant	Built	Columbia Heights 1345 Park Road	1	225	48,500	4.64	JBGR	Spaces shared with other retail tenants
Harris Teeter	Planned	Jenkins Row	6	NA	NA	4.00	JBGR	Under construction.
Safeway	Built	Bethesda Place	NA	148	43,000	3.44	Albemarle Group	
Harris Teeter	Planned	Adams Morgan Kalorama Road/17th Street	1	120	38,556	3.11	Faison	Under construction, some portion of spaces will be shared with day time office tenant
Range	High			225	53,300	4.69		
	Low			50	11,833	2.27		
Average				137	37,456	3.80		
<i>Institute of Transportation Engineers (ITE) Parking Generation (Demand)</i>								
Suburban Weekday:						4.36		
Suburban Saturday						4.75		
Urban Weekday						2.27		

LEGEND

Symbol	Store	Location	Distance to nearest Metro station (ft)
■	Square 54	NW corner of Eye Street/22nd Street intersection	200
■	Whole Foods	4530 40th Street	260
■	Harris Teeter	1391 Pennsylvania Avenue	320
■	Giant	1345 Park Road	885
■	Trader Joe's	2425 L Street	1275
■	Whole Foods	1440 P Street	2920
■	Harris Teeter	Intersection of Kalorama Road and 17th Street	3280
■	Safeway	7625 Old Georgetown Road, Bethesda, MD	6785
●	Metro Station		

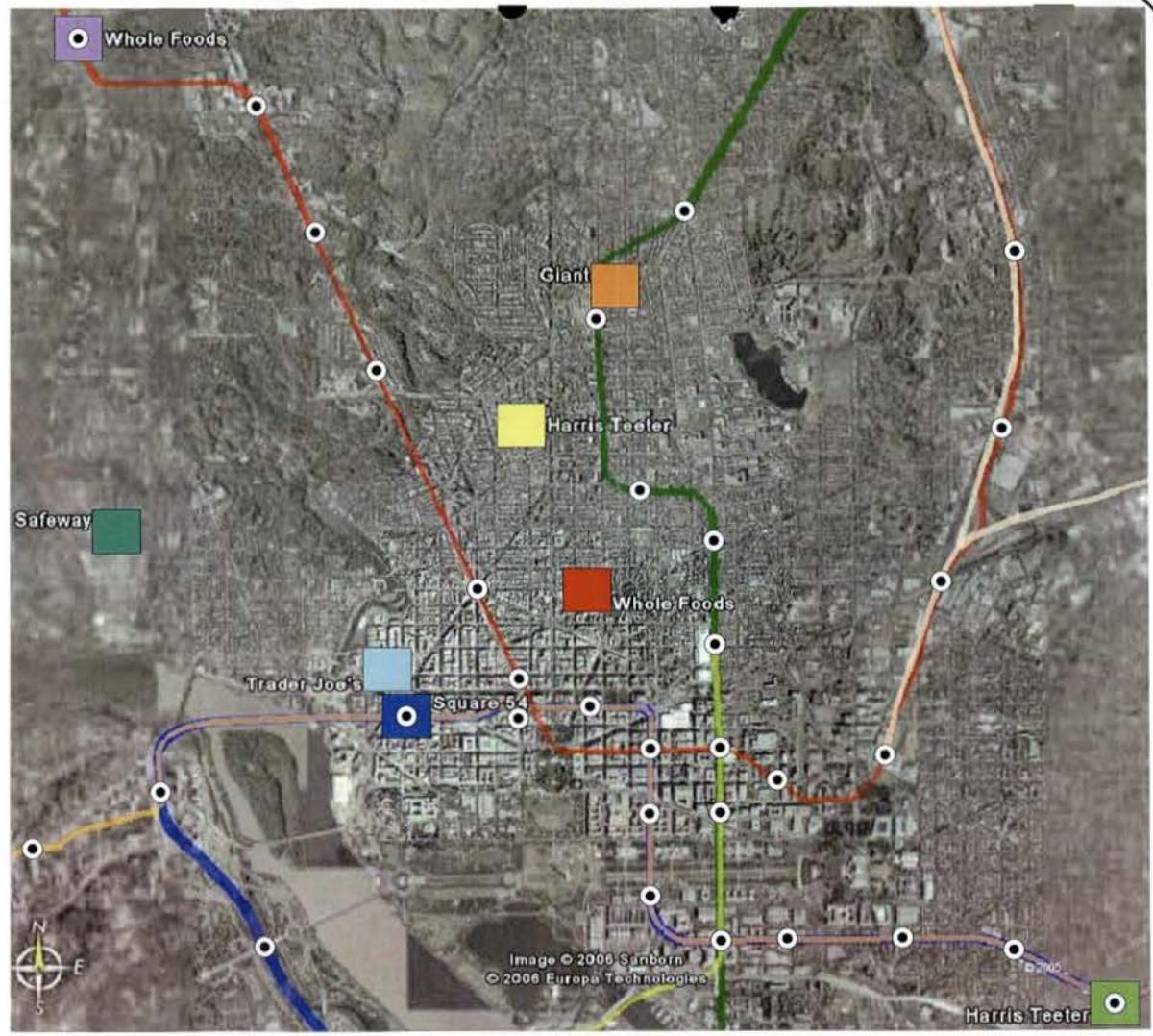


Exhibit 3
Proximity of Grocery Stores to Metro Stations

Square 54
Washington, D.C.

 WELLS & ASSOCIATES, LLC
TRAFFIC, TRANSPORTATION, and PARKING CONSULTANTS

