



WELLS + ASSOCIATES

RECEIVED
D.C. OFFICE OF ZONING

2011 NOV 10 AM 9:03

November 9, 2011

District of Columbia Zoning Commission
441 4th Street, N.W.
Washington, D.C. 20001

RE: Case No. 07-21B: Modification to PUD at Square 50
PerStar M Street Partners LLC

Dear Commissioners:

We are in receipt of the District Department of Transportation's (DDOT's) supplemental report dated November 3, 2011 regarding the above-referenced case. According to DDOT's supplemental report, DDOT has been working toward a "balanced transportation system that focuses on pedestrians, sustainable transportation and safety." We believe DDOT's goal of providing a balanced transportation system was the driving force behind DDOT's extensive vetting and feedback during the original PUD process that ultimately led to the three foot lay-by width design that was proposed by DDOT and approved by the Commission under the original PUD, and more recently supported by DDOT in its October 21, 2011 report to the Commission for the PUD modification. In summary, the three foot design was determined by DDOT to: (1) maximize the sidewalk width, thereby enhancing the pedestrian experience and (2) create a buffer zone for safety of passengers boarding and alighting in the lay-by lane. A three foot lay-by lane is used at other hotels in the District, notably the Mayflower on Connecticut Avenue. While we note that in its supplemental report of November 3, DDOT has indicated its general support of lay-by lanes for certain uses, including hotels, the report does not address the specific width DDOT believes to be appropriate for the proposed hotel at 2201 M Street, NW. It is our understanding from recent discussions with DDOT that DDOT will determine the specific, appropriate width for the lay-by during the Public Space Permit process. Therefore, we request that the Zoning Commission incorporate the previously approved, current design of three feet while allowing the flexibility for the width of the proposed lay-by lane to increase to a maximum of eight feet in width.

In its supplemental report, DDOT listed a number of factors should be considered in the design of the lay-by lane. The following summarizes those factors and the implications regarding both the three foot width and the eight foot width:

ZONING COMMISSION
District of Columbia

CASE NO. 07-21B
EXHIBIT NO. 47

- Minimum 10' clear sidewalk width adjacent to lay-by lane – Under the three foot lay-by design, the sidewalk width adjacent to the lay-by lane would be 13.5 feet, or 3.5 feet wider than the minimum 10 feet required. Under the eight foot lay-by design, the sidewalk width adjacent to the lay-by lane would be 8.5 feet or 1.5 feet narrower than the minimum 10 feet required. It is conceivable that the 10 foot minimum required could be achieved if the tree box width is reduced to 4.5 feet in lieu of the standard 6 foot width subject to DDOT approval during the Public Space Permit process.
- Pedestrian movement around vehicle (i.e. buffer zone) – The three foot lay-by design would create a buffer between the vehicle stopped in the lay-by lane and the next adjacent travel lane. With a three foot curb offset, the vehicles in the lay-by would take up more of the adjacent travel lane so that cars would not have enough room to “squeeze” by, thus creating the buffer zone for people boarding and alighting vehicles in the lay-by lane. An eight foot lay-by lane would function similar to an on-street parking lane in that vehicles in the lay-by lane would be immediately adjacent to a travel lane. Thus, no buffer zone would be provided.
- Vehicles entering traffic stream/limited sight distance – Under either scenario, vehicles that are to be parked in the garage would not re-enter the traffic stream. They would turn from the lay-by lane into the garage driveway. Other vehicles would enter the traffic stream from the lay-by lane in a manner similar to vehicles leaving an on-street, parallel parking space.
- Misuse of lay-bys by parked vehicles – Under either scenario, valet team will ensure efficient passenger loading/unloading and will prevent cars lingering in the lay-by lane.
- Length of lay-by lane – A queuing analysis was conducted (and reviewed by DDOT) to ensure that the proposed length of the lay-by lane could adequately accommodate the traffic anticipated to use the lay-by lane. Additionally, the hotel will ensure that the appropriate number of valets are employed during peak times to ensure that vehicles are processed efficiently.
- Presence of on-street parking – On-street parking is prohibited from 7:00 AM to 6:30 PM along the west side of 22nd Street (except for two spaces just north of M Street); therefore, utilization of an existing parking zone is not an option.
- Consideration of a circular driveway – Due to the size of the site, a circular driveway is not practical. Additionally, a circular driveway would introduce two additional curb cuts and would introduce additional conflicts between pedestrian and vehicles. We believe that an on-street lay-by lane is more appropriate in this instance.

Based on the above information, we believe that the proposed three foot lay-by lane furthers

District of Columbia Zoning Commission
November 8, 2011
Page 3 of 3

DDOT's goals of providing a balanced transportation system. However, we understand that the final width of the lay-by lane ultimately will be decided through DDOT's review of the Public Space Permit. Therefore, we request flexibility in the Zoning Commission's order to construct a lay-by lane with a minimum width of three feet and a maximum width of eight feet.

I trust this information will be helpful to the Commission in rendering its decision. Please do not hesitate to contact me at jlmilanovich@mjwells.com or 724-933-9010 should you have any questions regarding the enclosed.

Sincerely,

A handwritten signature in black ink that reads "Jami L. Milanovich". The signature is written in a cursive, flowing style.

Jami L. Milanovich, P.E.
Principal Associate

JLM/jlm

Enclosures