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May 24, 2011

Mr. Anthony Hood
Chairman
D.C. Zoning Commission
441 4th Street, N.W., Suite 210
Washington, D.C. 20001

Re: Z.C. Case No. 10-32 – Georgetown University Campus Plan

Dear Chairman Hood:

Enclosed is the written testimony of our traffic consultant, Joseph Mehra, which we had originally planned to present to the Commission on May 12 or 16. Since Mr. Mehra concurs with DC DOT that the Gorove Slade Transportation Report is deficient, but for entirely different reasons than identified by DDOT in its Report, we are submitting the Report now to give the University and its consultant time to cure the defects identified in Mr. Mehra's testimony, including the assumption that Reservoir Road is a four lane road when it is in fact a three lane road and the assumption that the number of parking spaces on campus is the limiting factor on the number of students driving to the University. The University's decision to withdraw its request for an additional 250 parking spaces on campus does not eliminate student traffic or parking demand in the adjoining neighborhoods. The University needs to explain in its revised Transportation Plan how the proposed movement of School of Continuing Studies

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students to a satellite campus by December 31, 2013 and other aspects of the revised Campus Plan will mitigate the objectionable traffic and parking impacts of its students or it has again failed to provide an adequate Transportation Plan.

Sincerely,

A handwritten signature in black ink that reads "Richard deC. Hinds". The signature is written in a cursive style with a large, stylized 'R' and 'H'.

Richard deC. Hinds

cc. Maureen Dwyer (Goulston & Storrs)
Robert Avery (FoxHall Community Citizens Association)
Ron Lewis (ANC2E0
Stuart Ross (ANC 3D)

CERTIFICATE OF SERVICE

I certify that copies of the foregoing *Citizens Association of Georgetown and the Burleith Citizens Association's Submission Regarding Testimony of Joe Mehra, in Opposition to the Georgetown University Campus Plan - ZC Case No. 10-32* was hand delivered or mailed, postage prepaid, on May 24, 2011 to the following:

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TESTIMONY OF JOE MEHRA, P.E. PTOE, IN OPPOSITION TO THE GEORGETOWN UNIVERSITY APPLICATION

At the request of the Georgetown and Burleith citizens associations, I have reviewed the Traffic Study and published reports for the Georgetown University (GU) Campus Plan prepared by Gorove Slade and the report prepared by DDOT. I reach the same conclusion as DDOT, the Gorove Slade report is deficient and does not support the “no impact” conclusions reached regarding proposed University and hospital expansion.

EXISTING CONDITIONS

Gorove/Slade collected traffic and parking data to conduct the traffic analysis, however some critical data elements were not presented in their Reports and may have not been observed or collected in the field. These data items include truck and bus trips, their travel patterns and their percentage of total travel on Reservoir Road and Canal Road. Truck trips to GU include deliveries as well as trash pick-up. Further, Metrobus and GUTS travel on these roadways and their presence impacts the traffic flow. The higher the truck/bus proportion, the lower the levels of service. The GUH conducted its own traffic study in May 2010. The GUH Transportation Management Report prepared by O. R. George and Associates (GU Pre-Hearing Submission dated March 31, 2011, Ex L) shows that the truck/bus percentages are 6-7 percent on Reservoir Road near 38th Street. The higher the percentage of trucks and buses in the traffic stream, the lower the level of service.

Another missing data item in the Groove Slade Report is the existing queues at congested intersections and the spillback on to adjacent intersections. This is critical to the analysis and impacts the levels of service.

Peak Hour Determination – Gorove/Slade report states that the “system” street peak hours are 7:45 to 8:45 AM and 6:00 to 7:00 PM. Further, Mr VanPelt testified in the cross that the peak hour is 6-7 PM. However, the data does not support this. The afternoon peak hours for most of the intersections are between 4:45 PM to 6:15 PM and not 6-7 PM. Use of system peak hours, masks the true volumes and the intersection level of service. For example, the intersection of GU Access Road and Canal Road peaks earlier than the analyzed system peak hour. The system peak hour volumes are 3,769 versus the actual peak hour volume which is 4,237 (12 percent higher). Further, Gorove/Slade states that they conducted field observations on March 7 and March 8 between the hours of 4:40 to 6:00 PM. This would suggest that they missed the observations during the peak hour and also, it seems, conducted their observations when GU was at Spring Break (March 5 through March 13) when traffic would obviously be lighter than normal.

GUH Campus Trip Generation – Table 1 (page 10) of Gorove/Slade Transportation technical Analysis shows that the GUH generates 208 inbound vehicles trips during the afternoon peak hour, based on their survey in February 2011. GUH conducted their own traffic study in May 2010. Their study showed that GUH generates about 425 vehicle trips during the afternoon peak hour. This is a significant difference (over a 100 percent difference) and needs to be explained. The morning peak hour data and the PM peak hour outbound trips are more or less consistent.

The GU Report shows that GUH trips during the 6:00 to 7:00 PM peak hour are 208 IN and 671 Out. We have looked at the traffic data included in the Gorove/Slade Technical Attachments and do not come up with these same totals.

GU Trip Generation – The Gorove/Slade report utilized parking lot observation data to come up with existing GU trip generation and trips. They made a major assumption that “no GU related vehicles park outside the campus”. This assumption was not substantiated with any survey. As a matter of fact, Gorove/Slade conducted a travel survey of the faculty, employees and students to determine their mode of travel to and from the GU. However, it seems that they did not ask where the vehicle was parked if they drove. Gorove/Slade computed the existing GU trips to be 259 and 415 during the AM and PM peak hours based on the driveway counts and parking lot data. It is interesting to note that George Washington University, located nearby, also used parking lot data to develop GWU’s trip generation but adjusted the data based on their travel survey to account for vehicles that did not park at GWU facilities. The differences were substantial - 804 GWU trips using parking lot data versus 1522 using the travel survey data during the AM peak hour. This is a very significant difference and Gorove/Slade should have analyzed it.

Similarly, Gorove/Slade did not consider visitors and GUH related staff/employees that may not park in the Campus. As a matter of fact, The GUH Report states that the GUH has a current shortage of 450 parking spaces. How is this demand being met? Presumably, this demand is being met by parking outside the Campus.

The number of travel lanes and their usage is critical in determining roadway capacity and levels of service. Gorove/Slade has used four travel lanes on Reservoir Road in front of the GUH to compute capacity and levels of service. However, there are only three travel lanes during the peak period and two travel lanes during the rest of the day. At no time, does Reservoir Road operate as a four lane roadway. This is a significant error and for all practical purposes negates the Gorove/Slade traffic analysis conducted along Reservoir Road at the GUH access roads. To highlight the significance of this error, I analysed the levels of service for the intersection of Reservoir Road and 38th Street and gate No. 1 during the AM peak hour. I used the same traffic data as Gorove Slade but used the correct number of lanes. The Gorove/Slade computed level of service grade A drops to a grade D, or from a delay of 7.3 seconds per vehicle to 48.5 seconds per vehicle.

Even utilizing erroneous data, Gorove/Slade showed that six of the twelve intersections analyzed have some approaches operating at grade F (unacceptable levels of service). In addition, four of the remaining six intersections have approaches operating at D or E. Correcting for the number of lanes could potentially drop these four intersections to F also.

COMPARISON OF 2011 AND 2000 CAPACITY ANALYSIS RESULTS

Gorove/Slade compares the levels of service results from their 2000 study to the current (2011) study and state that the levels of service have improved. However, in the 2000 analysis, Gorove/Slade used three travel lanes on Reservoir Road in 2000 and not four lanes as in 2011. This is probably the main reason why the levels of service appeared to have improved between 2000 and 2011.

FUTURE CONDITIONS

The future conditions are for the year 2020. The future traffic consists of existing traffic, normal growth in through traffic, traffic generated by other developments nearby and traffic generated by the GU expansion. Gorove/Slade stated that there are no approved developments nearby and “inherent growth on the adjacent roadways is assumed to be minimal due to existing capacity constraints.” (page 26). However, on page 27 Gorove/Slade states that no background growth was assumed. DDOT data shows that Reservoir Road has been growing at the rate of 1.1 percent per year compounded between 1968 and 2008 and 0.75 percent between 2002 and 2008. Canal Road has been growing at the rate of 0.5 percent (compounded) per year through 2008. Gorove/Slade study assumed no growth for background conditions. Due to the differences in growth rates (0% versus 0.5% or 0.75%), the total trips forecasted for some movements by Gorove/Slade are as much as 130 vehicles per hour less.

The GU growth in vehicle trips was based on GU driveway counts and does not include vehicular travel that does not park inside the Campus. If the GWU experience is applied to GU, the actual vehicle trip generation could be almost double the Gorove/Slade projections. The total trips in 2020 with the GU expansion are therefore significantly less than the projections based on DDOT growth rate and corrected GU trips.

In relation to the GUH future trip generation, Gorove/Slade has underestimated the hospital related trips by using driveway counts. As noted above, the GUH Report states that the GUH has a current shortage of 450 parking spaces.

LEVELS OF SERVICE - The future Campus Plan traffic does impact the traffic operations in the area. For example, the Gorove/Slade report shows that the intersection delay increases from 96.8 seconds per vehicle to 111.1 seconds per vehicle at the intersection of Reservoir Road and 38th Street due to the GU future traffic only. This level of service analysis for the future conditions have the same errors and omissions as in the existing conditions, including utilizing Reservoir Road as a four lane roadway rather than a three lane roadway. Further, the traffic projections used to compute levels of service are based on erroneous methodology and incorrect assumptions. If the DDOT growth rates are used and the GU/GUH trips are corrected, it is likely that several more intersections that are projected to operate at D levels may fail.

The mitigation, proposed by Gorove/Slade, consists of traffic signal retiming. Gorove/Slade does not state if they have discussed these changes with DDOT. The traffic signals are synchronized and changes cannot be made to individual intersections without analyzing their impacts on the entire corridor.

CONCLUSIONS

The proposed Georgetown University 2011-2020 Campus Plan will adversely impact traffic and parking in the surrounding community. Gorove/Slade traffic analysis has several errors, technical inconsistencies and deficiencies that impact the study results, including the levels of service, as described above. Due to these reasons, the Gorove/Slade study conclusions are invalid. Using Gorove/Slade results six of the 12 intersections analyzed currently have failing approaches. The future

conditions with corrected Reservoir Road lanes and corrected GU and GUH trips will result in several more approaches and intersections failing. The mitigation measures proposed have not been discussed with DDOT and may not be implementable.