8. The narrative does not mention M.E. Klinedeist when this appears to be the owner of the area with the surviving surface foundations.

I recommend that the report must at least address the three major issues presented above before it is finalized. The remaining comments are relatively minor, but should be considered, especially in preparation of the Phase I survey report.

With the exception of these recommended changes, I concur with the findings and recommendations as presented in the report. If you have any questions regarding this review, please contact me at (202) 727-7360.

Sincerely,

Laura Henley Dean

Laura Henley Dean, Ph.D.
Archeologist
Historic Preservation Division

cc: Dr. Stephen R. Potter, Regional Archeologist
National Capital Region, National Park Service
1100 Ohio Drive, S.W.
Washington, D.C. 20242

Lisa DeLeonardis
3621 Hilmar Road
Baltimore, Maryland 21244-3121

Board of Zoning Adjustment
District of Columbia
CASE NO.16566
EXHIBIT NO.7A6

FEB 1 1995

Refer to: HPC-15

Mr. Reginald W. Griffith
Executive Director
Planning, Review and Implementation Division
National Capital Planning Commission
Suite 301
801 Pennsylvania Avenue, N.W.
Washington, D.C. 20576

Dear Mr. Griffith:

The Federal Highway Administration (FHWA), in cooperation with the National Park Service (NPS), and the Government of the District of Columbia is in the process of preparing a highway demonstration project to improve the access to Georgetown University from Canal Road in the District of Columbia. This project has been designated as DE-0014(801). On August 25, 1993, an informal meeting was held with members of your staff to provide a brief introduction of the project. Because of your Federal planning and preservation responsibilities within the study area and your technical expertise in subject areas likely to be the focus of the environmental review, we request that your agency participate as a cooperating agency in the Environmental Impact Statement (EIS) process.

This demonstration project was authorized by Section 149(a)(14) of the Surface Transportation and Uniform Relocation Assistance Act of 1987 (Public Law 100-17; 101 Statute 132, 183; April 2, 1987), as amended by Section 338 of the Department of Transportation and Related Agencies Appropriation Act of 1990 (Public Law 101-164; 103 Statute 1069, 1099; November 21, 1989). Copies of these excerpts are enclosed.

We understand that pursuant to the National Capital Planning Act of June 6, 1924 (43 Statute 463; 40 United States Code 71, et. seq.), the National Capital Planning Commission must review this demonstration project, as a District of Columbia sponsored project.

On October 29, 1992, a public notice in the Federal Register was published stating that an EIS was going to be prepared. On February 11, 1993, an open house informational meeting was held to offer an opportunity for the public to ask questions and submit written comments concerning the proposed project. Public meetings were held on September 14 and October 12, 1994, to offer additional opportunities for the public to comment on the project. In addition, meetings have been held with the Citizens Association of Georgetown, the C&O Canal Advisory Commission, the Palisades Citizens' Association, and local Advisory Neighborhood Commissions to brief these groups about the project.

CONCURRENCES	
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FA Form 1360-14 (6-81)

OFFICIAL FILE COPY

On December 1, 1993, a meeting was held with the District of Columbia, Department of Consumer and Regulatory Affairs, Historic Preservation Division to discuss the preliminary archeological assessment for the project. This meeting was followed by a January 19, 1994, letter requesting the initiation of formal consultation with the Historic Preservation Division.

We have enclosed conceptual plans of the three alternatives to be studied in the draft EIS. The no-build alternative will also be included in the draft EIS. Existing right-of-way lines have been highlighted on each plan view. The public laws referenced above, require that Georgetown University dedicate at least 2.5 acres of land as a scenic easement. Since the exact location of this easement has not been identified, it is not shown on these plans.

We are planning to proceed with the preparation of the EIS, while keeping your office informed of major decisions and developments as they occur. We will provide you with the draft EIS for review and comment and meet with you to resolve any outstanding issues. After the final EIS is prepared, we will submit copies to your office.

Your agency's involvement should entail those areas under its jurisdiction and no direct writing or analysis will be necessary for the preparation of the EIS.

We are available to discuss any issues related to the project, including activities that you believe are necessary to maximize interagency cooperation. If you have any questions, please contact Mr. Jim Sinnette, Environmental Planning Engineer, at (703) 285-0085.

Sincerely yours,

For Gary L. Klinedinst
Division Engineer

Enclosures

cc:
Mr. Robert G. Stanton, Regional Director, National Capital Region, National Park Service, Washington, D.C.

Mr. Don Goffredi, DC Department of Public Works, DECA, BTCS, DED, Washington, D.C.

Mr. Arthur J. Hill, Division Administrator, FHWA, Washington D.C.

Federal Highway Administration
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cc: EFLHD, Chrono, P&C, P&C Rdg

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FHWA Form 1360-14 (6-81)

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NATIONAL CAPITAL PLANNING COMMISSION

COMMISSION MEMBERS

Appointed by the President of the United States
Glen T. Urquhart
CHAIRMAN

Melvyn J. Estrin
Dr. Thaddeus Garrett, Jr.

Appointed by the Mayor of the District of Columbia
Dr. Patricia Elwood
Edward S. Grandis, Esq.

Secretary of Defense
Honorable William J. Perry

Secretary of the Interior
Honorable Bruce Babbitt

Administrator of General Services
Honorable Roger W. Johnson

Chairman, Committee on Governmental Affairs
United States Senate
Honorable John Glenn

Chairman, Committee on the District of Columbia
U.S. House of Representatives
Honorable Fortney Pete Stark

Mayor, District of Columbia
Honorable Sharon Pratt Kelly

Chairman, Council of the District of Columbia
Honorable David A. Clarke

IN REPLY REFER TO:
NCPC File Nos. 1200 and MP135

FEB 0 9 1995

Mr. Gary Klinedinst
Division Engineer
Federal Highway Administration
21400 Ridgetop Circle
Sterling, Virginia 20166-6511

Dear Mr. Klinedinst:

In response to your February 1, 1995 request, this confirms that the National Capital Planning Commission will serve as a cooperating agency with the Federal Highway Administration in the development of the Environmental Impact Statement (EIS) for the proposed Highway Demonstration Project for the Canal Road Entrance to Georgetown University.

Maurice Foushee, our Environmental Affairs Officer, has been assigned primary responsibility for coordinating the Commission's participation in the National Environmental Policy Act process. If you have any questions regarding this matter, please contact Mr. Foushee at (202) 724-0174. We look forward to working with you in the development of the EIS.

Sincerely,

Reginald W. Griffith

EXECUTIVE DIRECTOR
Reginald W. Griffith

Reginald W. Griffith
Executive Director

APPENDIX C

Georgetown University
Comprehensive Transportation Management Plan

(Prepared 1989, BZA-Approved 1990)

Comprehensive Transportation Management Plan

The continued growth in the number of people who work, teach and study at the University each day, as contrasted to a fixed number of parking spaces that are permitted by the Campus Plan, requires some portion of the commuter population to shift mode. The objective of the transportation management program is to provide a way for this transition to occur efficiently and voluntarily with a minimum of disruption to University operations.

To engender shifts in the mode of commuting requires both incentives — making non-driving modes more attractive, and disincentives — discouraging the use of the limited number of parking spaces.

In the category of incentives are those actions that make it more attractive for students, faculty and staff to use other modes — primarily ridesharing and transit.

Although ridesharing among University students and faculty is difficult due to the varying schedules and uncertain hours on campus, the University is committed to this concept and forty percent of the Main Campus faculty and staff have indicated a positive response to the provision of a ridesharing matching service. Presently, the Transportation, Traffic and Parking Department promotes the carpool program. This program will be enhanced by appointing a Ridesharing Coordinator to assist in the formation of additional carpools and vanpools. This person will report to the Director of Transportation, Traffic and Parking and will maintain lists of travel time and residence areas for those seeking to join ridesharing arrangements. The potential does exist to shift more travelers for more trips, especially in concert with the suggested improvements in transit accessibility, and increases in the cost of parking.

Based on experience, it is clear that ridesharing among staff is feasible if their hours are more compatible. Staff who enter into ridesharing arrangements must be assured that:

1. They will not be censured for keeping regular working hours; i.e. leaving at a set time.
2. They can return home during the day if necessary.
3. They can transact necessary University business during the day without having to use their own car.
4. They will have a safe way to get home if they must work late.

Items 1 and 2 are closely connected. The University encourages staff ridesharing by making a commitment to its accomplishment at the highest levels of management. Associated actions include:

1. A policy statement that overtime should be requested only in unusual situations.
2. A policy and commitment to pay cab fare or to provide a University vehicle to persons in ridesharing arrangements who must work overtime, or who must leave work for a personal emergency.

3. A policy to provide cab fares or a University vehicle to persons who otherwise would need to use their personal vehicle for University business.

The other option to driving to campus is to use public transit. In telephone surveys, the most frequently cited reasons for not using public transit is that it "takes too long" or that it is inconvenient. The University continues to address the time convenience factors through private operation of its shuttle bus service.

In the Washington area there has been a major investment in public transit facilities that reach almost all areas of the region. Where concentrations of University commuters are found who do not have good access to the transit system, these corridors are targeted for University-sponsored carpools and vanpools. For other commuters, the University can most effectively use its resources to encourage public transit use by supporting the regional system; using the regional network to bring commuters to a few points and then providing connections to the campus. The current G.U.T.S. service does this, in part, by providing a fifteen minute peak period connection to the Rosslyn and Dupont Circle Metrorail stations.

The G.U.T.S. bus service will continue to be reinforced as an integral element of the transportation facilities serving the Georgetown Campus. Its mission is twofold:

1. Provide connections for staff, faculty and students to the regional transportation system.
2. Provide connections to areas that are beyond walking distance, and which contain heavy concentrations of students as well as staff and faculty who may live in the same areas.

The most efficient strategy to carry out the first mission is to:

1. Use the regional transit services to bring employees, faculty and students from residential areas to a few collection points.
2. Use G.U.T.S. to provide frequent connections between the campus and the regional transit system.

The goal is to elevate ridesharing and transit in status so that they become the accepted alternative transportation modes for commuting to the University.

In addition to the above measures, there are several additional components of a transportation management program under consideration by the University. These primarily address the cost issue and include the following:

1. Increase the price of parking.
2. Expand the G.U.T.S. service to and from Metrorail stations and outlying areas.
3. Offer financial assistance to transit users.
4. Provide support for vanpools.
5. Provide University-owned vehicles for work-related travel during the day.
6. Pay taxi fares to vanpool or carpool riders who are required to work overtime.
7. Continue exploration and development of alternate transportation systems.

APPENDIX D

Public Coordination

D-1 Public Correspondence Prior to Availability of the Draft Environmental Impact Statement

D-2 Public Meeting and Hearing Information Items

D-3 Project Newsletters

APPENDIX D-1

Public Correspondence Prior to Availability of the Draft Environmental Impact Statement

Feb. 12, 1993

Arthur Hill
Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street N.E.
Washington, DC 20002

Dear Mr. Hill:

As a District of Columbia resident who lives along MacArthur Boulevard, I want to thank and compliment your agency for the Public Information Meeting held on Feb. 11 concerning the proposed two-way access into the Georgetown University parking lot from Canal Road. Your representatives were most courteous and helpful in going over the drawings and explaining the various alternatives. What impressed me most was the openness with which you are approaching what almost inevitably will be a controversial project. You said you would welcome written comments, so here are some for what they are worth:

--Georgetown University Position-- I think it would be helpful if all parties concerned read the testimony presented by Father William George of Georgetown to the House Public Works Subcommittee on Surface Transportation on June 16, 1983. In that testimony certain statements were made that may still be pertinent and accurate or which may be contradicted by some of the alternatives under consideration. References to that testimony will be made as I go along.

--Traffic Flow --Canal Road is a major artery leading into downtown Washington, used by thousands of commuters from Northwest Washington and the Maryland and Virginia suburbs. As Father George testified in 1983, it is a "quasi-interstate highway," a "major access" road which "is already a congested road, classified as 'F' during the rush hour." Ten years later, the traffic congestion undoubtedly is worse. Particularly during morning rush hour, traffic seeking to get on Canal Road backs up for several blocks along MacArthur Boulevard and Foxhall Road and on Canal Road itself before the intersection with Foxhall. Environmentally, the idling cars already present a pollution problem in a residential area. It follows, therefore, that from an environmental standpoint nothing should be done that would impede the flow of traffic along Canal and cause additional backup of traffic in a residential neighborhood. On environmental grounds, that would seem almost certainly to rule out Alternative 2 which proposes installation of a traffic light at the intersection. But whatever alternative is selected to provide eastbound traffic access to the parking lot, it inevitably is going to lead to greater use of Canal Road, MacArthur Boulevard and Foxhall Road and thus to greater traffic congestion and pollution in a residential area.

--Georgetown Traffic --In your statement, you say "this project is expected to have a positive impact on traffic and air quality on local Georgetown Streets." Put another way, this amounts to saying the air pollution problems resulting from the parking lot traffic will be transferred to other residential areas, such as those along Foxhall and MacArthur Boulevard. Even if the Prospect Street entrance to the parking lot is closed, I question how much this will relieve traffic congestion in the Georgetown neighborhood near the university. My own observation from driving in the area during rush hours is that much of the congestion results from traffic from northwest Washington (not Georgetown University) seeking access to Key Bridge by way of 34th Street.

I might also add that in complaining about the traffic on their streets, the Georgetown residents in a way are paying a price for refusing to let the subway come to Georgetown. Bus transportation to the campus is infrequent and erratic, discouraging the use of public transportation to get to the campus.

--Aesthetic Impact- It seems to me that all the alternatives from 3A through 3F would have an adverse visual and aesthetic impact on one of the most historic views in Washington. That stretch of Canal Road provides one of the best vistas of the canal, encompassing the canal, the terminal in Georgetown, the Potomac River and the Virginia shore. One feels drawn back in history as one views the canal and frequently sees a barge being drawn up the canal. It is a sight that I point out to all my out-of-town guests as I give them a tour of Washington. Alternatives 3A through 3F wwould all involve the construction of 20-foot high ramps, obstructing the view of the canal and river for cars travelling along Canal Road. From across the river, the ramps would deface the vista of the Palisades and the towers of Georgetown in the background. Father George admitted as much in his 1983 testimony when he commented that all the alternatives had aspects that were "not environmentally acceptable." He said, "The flyovers and underpasses, cuts in the media, whatever, and when you take into consideration the park, you had certain things that were not environmentally acceptable. The underpass (alternative 3G in your statement) was considered the most acceptable solution." He later went on to say: "One of the thoughts when the city first suggested an overpass, can you imagine what would happen if you suggest an overpass over the canal? It won't work."

It is true that the underpass would not present as much of an aesthetic problem as the raised ramps. But even with the underpass, you would confront the pollution problem since it would encourage additional cars to use Canal Road by providing eastbound access to the parking lot.

--Cost--In terms of the stringent fiscal environment confronting the Federal government, the city and Georgetown

University, what would be the cost of the various alternatives? I gather there is $6 million in unspent appropriations and that Georgetown University would grant scenic easement on 2.9 acres of land, valued in 1983 at $1.2million by Georgetown. In 1983, this Georgetown grant of scenic easement was said to be in lieu of a 20 percent contribution by the District of Columbia to the project. Would the $6 million still be adequate to cover the cost of alternatives 3A through 3G? Some of your representatives at the Public Information meeting suggested the cost could run as high as $14 million. If so, where is the additional money going to come from? If the cost is higher, would Georgetown's grant of scenic easement still free the District of Columbia from making any contribution?

Talking about the underpass, which I gather was the basis for the $6million estimate and appropriation, Father George testified in 1983 that "our architects and engineers said it is very simple and it is about $2.5million cheaper if you went down rather than construct overpasses." Is that still the case?

--Bicycle Access--As you may know, the National Park Service plans to turn the abandoned railroad right-of-way that runs along the canal into a hiking and bicyle path that would stretch from Bethesda to Georgetown. At one point that trail comes very close to a tunnel that goes from the canal path under the canal to a sidewalk on the north side of Canal Road that leads directly to the Georgetown parking lot. Why not provide a connection, thus encouraging an environmentally sound and physically commendable way of getting to the Georgetown campus?

I hope you will find these comments helpful.

Sincerely yours,

John W. Finney

5275 Watson St. NW
Washington, DC 20016
202-

ANC 2 E
BURLEITH, FOXHALL/MACARTHUR, GEORGETOWN, HILLENDALE

VIA FAX

February 19, 1993

Mr. Arthur Hill
Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street, NE
Washington, DC 20002

Re: Improvements to Georgetown University
Entrance at Canal Road

Dear Mr. Hill:

I am writing in my capacity as Chair of ANC 2E representing approximately 16,000 people who live in and around Georgetown. At our regularly scheduled February meeting, notice of which was conspicuously posted, ANC 2E adopted the following resolution by unanimous vote:

BE IT RESOLVED, ANC2E requests that the Federal Highway Administration expand the scope of the Georgetown University South Entrance Environmental Impact Statement (EIS) to include the impact of traffic on the buildout of the campus as specified in the approved Campus Plan, including but not limited to, the increase in the number of individuals traveling to the campus. ANC 2E further requests details of the numbers of persons currently traveling to the campus, including identification of where they live and details of the number of cars currently parked on the campus.

We are gravely concerned that any Environmental Impact Statement (EIS) on the referenced project include the impact upon the roadways of the future planned building on the campus of Georgetown University.

The University has included in its Campus Plan (which was approved by the Board of Zoning Adjustment (BZA) in October of 1990) an additional 3.57 million square feet of buildings. Any EIS which does not include the impact of this planned building would certainly be flawed.

I understand that the University has made statements to your office to the effect that the future buildings must receive regulatory approval and are just "a dream" and has suggested that you not include the buildout in the EIS.

I would like to make two points which will show that the position that the University is taking before your Agency is disingenuous at best:

First, each and every building that the University has submitted to the BZA -- since the inception of the BZA -- has been approved. Thus, it is logical to assume that the buildings which appear in the Campus Plan and which have already received approval "in concept" will indeed receive building permits.

More important, however, are the positions that the University has taken with regard to the future buildings before the BZA and the Public Service Commission (PSC). The records before both Agencies are replete with statements and affirmations that the University's future building

plans necessitate the building of a 56,000 Watt co-generator on the campus. In essence, the University has argued that, while their current consumption of steam and electricity would not warrant the building of a co-generator this large, the planned building expansion over the life of the Campus Plan will so increase their power needs as to justify this huge Power Plant.

Clearly, the University's representations to your office are directly in conflict with those they are making before other Agencies. Indeed, in representations to the PSC, the University specifically rejected the suggestion that it would not receive approval of all future buildings.

We urge you to include within the EIS the impact upon traffic flow of the planned expansion which appears in the Campus Plan. To do otherwise would make yours the only Agency in which the University is arguing that the full impacts of the Campus Plan would not be felt.

Thank you for taking into consideration the views of the many people represented by ANC 2E.

Sincerely,

/S/
Westy McDermid
Chair, ANC 2E
1631 34th Street, NW
Washington, DC 20007
202/

ANC 2 E
BURLIETH, FOXHALL/MACARTHUR, GEORGETOWN, HILLENDALE

February 21, 1993

Mr. Arthur Hill
Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street, NE
Washington, DC 20002

Re: Improvements to Georgetown University
Entrance at Canal Road

Dear Mr. Hill:

I am writing in my capacity as Commissioner for Single Member District ANC 2E-01, representing the neighborhoods of Foxhall and MacArthur which lie directly to the west of Gerogetown University.

I hereby request that your Agency carefully review the attached testimony of Georgetown University before Congress in which they clearly asked for funds for an Underpass and stated that an Overpass "wouldn't work."

It would appear that Congress appropriated funds for an Underpass and that your Agnecy is without jurisdiction to consider an Overpass in the Environmental Impact Statement.

Please review the legal implications and notify our ANC accordingly.

Best regards,

D. Swan

cc Foxhall Community Citizens Association
Palidases Citizens Association

HFO-DC.1

March 24, 1993

Ms. Dianne Sawaya
Commissioner ANC 2E-01
4444 Greenwich Parkway NW
Washington, D.C. 20007

Dear Ms. Sawaya,

Thank you for your February 21 letter on the issue concerning Congressional intent for the proposed improvements to the Georgetown University Canal Road Entrance.

We have reviewed the information you provided and have researched the legislative history for this project. We conclude that the language of the statute does not preclude our looking at overpass schemes in the draft Environmental Impact Statement (EIS).

The 1983 hearing testimony represented the opinion of Georgetown University, but this is given relatively little weight in determining Congressional intent. We could find nothing in the 1987 statute, committee reports, nor formal Member testimony which limits the improvement to an underpass. If Congress intended to limit the improvement to an underpass, they could have included language to that effect in one of the above mentioned documents. As the law is written, it allows for any improvement "substantially improving motor vehicle access..." As part of the EIS process we will look at reasonable alternatives that can improve access at this location. We will certainly consider any conclusions reached by earlier studies as we arrive at our own conclusion here in 1993.

Thank you again for the comments you have provided us on this project. Input such as yours greatly improves the environmental document and makes it a better decision making tool for all of us. We hope you will agree that the EIS process - identifying a range of alternatives, evaluating their impacts and presenting them to the public for comment - is a better decision making

- more -

process than allowing the ten year old hearing testimony of one party to limit the range of alternatives. We will continue to keep you, and ANC 2E, appraised of the status of the project; we anticipate distributing our first newsletter in late April/early May.

Sincerely,

for Arthur J. Hill, P.E.
Division Administrator

cc: Mr. Ken Atkins, EFLH
Mr. Chuck Grant, OPP
Mr. Jeff Knoedler, NPS
Mr. Frank Locke, HRC-03
Ms. Westy McDermid, ANC 2E Chairwoman

THE PALISADES CITIZENS' ASSOCIATION
POST OFFICE BOX 40603, PALISADES STATION, WASHINGTON, DC 20016

February 22, 1993

Mr. Arthur Hill
Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street, N. E.
Washington, D.C. 20002

RE: FHWA Proposed Project No. DE 0014(801)

Dear Mr. Hill:

The Palisades Citizens' Association has, since 1926, served the community of the Palisades of northwest Washington. Our membership area includes MacArthur Boulevard throughout its length in the District, Canal Road west of Foxhall Road to the Maryland-District line, and major portions of Foxhall Road.

At its regular monthly meeting on February 2, 1993, the Palisades Citizens Association adopted a resolution authorizing and directing me to convey to the Federal Highway Administration its objection, in the strongest possible terms, to the proposed project in any of its various forms.

Our opposition is based principally on the following points:

- The need for, and public benefit to be derived from, the proposed project in any of its various forms have not been demonstrated. Other than anecdotal evidence put forward by the principal beneficiary, there is no basis for the assumption either that all existing entrances to the Georgetown University campus are not fully adequate for current and planned purposes, or that making the Canal Road entrance a "two-way" entrance would substantially affect traffic at other entrances.

- The proposed project in any of its various forms would result in the main entrance to the Georgetown University campus being adjoined with the single most heavily travelled commuter route in this part of the city and a very heavily travelled route at all times. As anyone who has ever attempted to use these streets during rush hours knows, they are severely gridlocked at these times, with major air pollution a sad and deplorable result. Most certainly, additional and substantial traffic gridlock would be a primary result of the proposed project in any configuration,

most particularly during rush hours, and additional degradations in air quality can safely be predicted, with significant adverse impacts.

- There is no indication that reconfiguration of the Canal Road entrance would result in diminished traffic volume at either of the other entrances to the Campus. In particular, in the absence of other major changes on the campus itself, there is no reason to believe that traffic volume on Reservoir Road would be decreased, in light of the proximity of the Hospital to that entrance.

- Traffic studies conducted a decade ago, in part with the support of this organization, demonstrated conclusively that reconfiguration of the Canal Road entrance would result in very significant traffic bottlenecks in Georgetown as well as on Canal Road, the Whitehurst Freeway, Foxhall Road, MacArthur Boulevard, and other neighborhood streets feeding into or running parallel to these routes. The conclusions of these studies were principally responsible for the project being abandoned at that time. It is beyond dispute that traffic volume on MacArthur Boulevard and these thoroughfares has grown very substantially in the years since these studies were completed.

  In this connection, we point out that both Foxhall Road (particularly its southerly portions South of Reservoir Road) and MacArthur Boulevard are two-lane residential streets with minimal set-backs. Traffic congestion on these streets has already increased to the point where their residential character is severely eroded, particularly during rush hour. Funneling additional traffic onto these streets would have immediate and significant adverse effects on the abutting properties and on property values in the affected areas generally.

- The proposed project would unquestionably have a severely disruptive effect on traffic going both ways during the lengthy period of construction that we assume would be required to complete the proposed project in any of its various forms. This fact alone would counterbalance any benefits to be derived.

- The proposed project in any of its various forms would substantially alter a route into and out of the city that has unquestionable scenic and historic value. Virtually all the proposed configurations would involve underpasses and/or overpasses that would turn this scenic stretch of road into an aesthetic nightmare of steel, concrete and asphalt. We find it difficult to imagine <u>any</u> benefit, public or private, that would justify this type and scale of construction and the aesthetic and environmental damage that it would cause.

- No consideration has apparently been given to the additional alternatives of reconfiguring the other existing entrances to expedite the flow of traffic at these locations -- an oversight that is inexplicable.

- Finally, we note that Canal Road currently serves as a principal route to and from Georgetown for joggers, pedestrians and bicyclists, many of whom are contributing to a solution to the ever-growing pollution problem in the immediate vicinity. This route possesses major advantages of sunlight, directness and no at-grade intersections, all of which would be put at risk by the proposed project.

The Palisades Citizens' Association therefore requests that this project be canceled forthwith. We request, in addition, that any Draft Environmental Impact Statement prepared in conjunction with this project be based, at a minimum, on the following:

1. An independent, scientifically based study that provides baseline data with respect to all vehicular traffic now entering and leaving the campus at all times of day;

2. An independent, scientifically based study that provides baseline data with respect to all vehicular traffic now using the following streets of the District of Columbia, and changes to such data that would be anticipated in connection with each of the proposed alternatives to the proposed project:

   -- M Street from 28th Street to 34th Street, N. W.;
   -- Canal Road from the District line to Key Bridge;
   -- Foxhall Road (entire Length);
   -- MacArthur Boulevard from the District line to Foxhall Road;
   -- Reservoir Road from Canal Road to 37th Street, N. W.;
   -- Potomac Avenue from Norton Street to Arizona Avenue, N. W.; and
   -- Green Street and Clark Place, N. W. (entire length).

3. An independent, scientifically based study that provides baseline data with respect to current air quality on all of the above streets as well as the "local Georgetown Streets" referred to in your handout made available on February 11, 1993; and changes to such data that would be anticipated in connection with each of the proposed alternatives to the proposed project;

4. An independent, scientifically based study that provides baseline data with respect to all non-vehicular traffic now using Canal Road as a route to and from Georgetown, and projects the effects on such traffic of each of the proposed alternatives;

5. An independent, scientifically based study that evaluates the additional alternatives of reconfiguring the other existing entrances to expedite the flow of traffic at these locations; and

6. An independent, scientifically based study that analyzes and quantifies the effects of each of the proposed configurations on the historic and scenic values embodied in the C&O Canal abutting Canal Road.

Please ensure that this organization is on your service list for any and all communications to the public or to Georgetown University on this matter.

Very sincerely yours,

Arthur R. Watson
President

cc: Honorable Sharon Pratt Kelly
Honorable James Nathanson
Ms. Eleanor Roberts Lewis
Ms. Westy McDermid
Jules Bernstein, Esq.
Honorable Leonard Meeker
Mr. John Finney
Mr. Mark Sandusky

HFO-DC.1

March 1, 1993

Mr. Arthur R. Watson
President
The Palisades Citizens' Association
Post Office Box 40603
Palisades Station
Washington, D.C. 20016

Dear Mr. Watson:

Thank you for your letter of February 22, 1993, concerning our proposed project DE-0014(801). We believe your request to cancel this project at this time is premature. We are currently looking at numerous preliminary alternatives to decide which to look at in more detail in the formal Environmental Impact Statement. As part of that more detailed review, we will consider your suggestions for areas of study along with those of other interested parties.

As requested, we will add your organization to the mailing list to receive the public newsletter for this project. Input such as yours helps the environmental document to be a better decision-making tool for all of us.

Sincerely,

for Arthur S. Hill, P.E.
Division Administrator

cc: Mr. Kenneth Atkins, EFLH
Mr. Tom Stallman, GU
Mr. Tom Roth, DECA, BTCS

Advisory Neighborhood Commission 3B

DISTRICT OF COLUMBIA

P.O. Box 32312 • Washington, D.C. 20007 (202)
Glover Park • Cathedral Heights

3B01
orthern Glover Park
Barbara A. Hamer

3B02
Eastern Glover Park
David C. Jory

3B03
stern Glover Park
Sandra J. Panchak

3B04
Cathedral Heights
Charles M. Seigel

3B05
uthern Glover Park
Joe Corey

Inistrative Assistant
Diane Ney

March 31, 1993

Mr. Arthur J. Hill
Division Administrator
Federal Highway Administration
Union Center Plaza
Suite 750
820 First Street, N.E.
Washington, D.C. 20002

Dear Mr. Hill:

The following resolution was passed by a quorum of Commissioners at Advisory Neighborhood Commission 3B's regularly scheduled March meeting, notice of said meeting having been posted in at least two public places in each of the five single member districts:

> WHEREAS ANC 3B is concerned about the impact on traffic in its designated area resulting from the proposed entrance to Georgetown University on Canal Road, and
>
> WHEREAS ANC 3B commissioned a traffic study (enclosed) that found there would be a negative impact on areas surrounding the university if such an entrance were built,
>
> RESOLVED, that ANC 3B urges the Federal Highway Administration to expand its Environmental Impact Study to take into consideration all future building on Georgetown University campus and all relevant studies, including the traffic study commissioned by this ANC.

The resolution was passed with a vote of 4-0-0.

Sincerely,

Joe Corey/dn

Joe Corey
Chair

JC/dn
Enclosure

May 19, 1993

Mr. Arthur Hill
Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street NE
Washington, DC 20002

re: Georgetown University Canal Road NW Entrance
FHWA Project. No. DE0014(801)

Dear Mr. Hill:

I live in the Palisades section of northwest Washington and use Canal Road frequently. My most common use is as a bicycle commuter traversing the sidewalk adjacent to Canal Road below Georgetown University (GU). Something must be done with the entrance to GU because vehicles exiting GU to head west on Canal Road look only to the left (east) which is in the direction of the one way traffic on that side of Canal Road. Sidewalk traffic coming from the west is in danger. The fact that the stop sign is not at the corner, but back up the hill doesn't help either. Even drivers entering GU who can see sidewalk traffic usually won't stop for bikers or walkers going east on the sidewalk. I have almost been hit on several occasions. Thus, I would oppose Alternative 1 because it maintains the current unsafe condition.

Alternative 2 would be my choice because it would improve access to GU and facilitate better traffic control vis-a-vis the sidewalk. It also would be an appropriate scale with the canal, GU and that stretch of roadway, unlike the Santa Monica Freeway or Cross Bronx Expressway style Alternative 3 options. Alternative 2 might slow traffic slightly, but could be timed with the signal at Canal and Foxhall and the one at Canal and the Whitehurst to minimize the problem. That whole section is a mess at rush hour anyway (one reason I'm on the sidewalk), but I certainly wouldn't want to see Canal widened, or a massive wall, underpass, overpass, or whatever put there. Also, none of the Alternative 3 options seem to accommodate the sidewalk at all. Not only I, but lots of other bicyclists and pedestrians, use the walk to get to and from Georgetown and the rest of the city. Lastly, Alternative 2 will give GU the access it needs with the lowest federal cost of any of the Alternative 3 options. Wouldn't it be nice to be able to do something right and under budget?

Sincerely,

G. Brockwel Heylin

G. Brockwel Heylin
2424 Chain Bridge Road NW
Washington, DC 20016

GUENT53.BH3

Dec. 23, 1993

Arthur Hill
Dvision Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 Friat St. NE
Washington, DC 20002

Dear Mr. Hill

In driving down Canal Road today, I noticed that crews were making test borings, presumably as part of your study for construction of a proposed two-way access into Georgetown University.

That prompts me to ask the following questions so that we can keep our neighborhood residents informed in our *Palisades Newsletter* about a project that may adversely affect their access to downtown Washington:

#Has a final or tentative decision been made among the alternatives listed in your public information meeting last Feb. 11? If so, which alternative has been selected or which are you leaning toward?

#Do you have adequate funds to go ahead with the project or will additional appropriations be required of Congress?

When and where do you plan to have a public hearing on project?

Have you completed an EIS on the project? If so, can a copy be provided the Palisades Citizens Association?

Have you issued a "project newsletter," as promised in the February meeting? If so, would you please provide me with copies for background for any story I may write for the *Palisades Newsletter*?

#What understanding has been reached with Georgetown Univeritty on donation of land and what value has been placed on the donation?

#When do you expect construction to start? How long is construction expected to take? What will be effect on traffic on Canal during construction? One lane? Stop-and-go? Detour?

I realize that I have asked many questions for you to answer. Perhaps with some, it would be more convenient for you to answer them over the phone. You can reach me at 202-

When you do have a public hearing, I am sure that the Palisades Citizens Association would like to be heard. So I request that you keep Marcia Allen, President of the Association who lives at 4800 Calvert St. NW DC 20007, informed on your plans.

Sincerely yours,
John W. Finney

John W. Finney
3275 Watson Street N.W.
Washington, DC 20016-3343

202-

Citizens Coalition
3710 S Street, N.W.
Washington, D.C. 20007

February 28, 1994

Mr. Arthur Hill
Federal Highway Administration
Washington, D.C.

Dear Mr. Hill:

Thank you for your first Project News on the Georgetown University Canal Road entrance project. The idea of such a newsletter is a good one, and the Citizens Coalition of neighborhoods that surround GU found your first issue informative. There are several questions we need to direct to you:

1. What is the status of preparation of the EIS? (Has work begun? Have the informational categories to be developed been selected? Were any interested outside agents or firms involved in the selection process?)

2. Is it true, as Project News indicates, that the same agency (NHWA) would both prepare and approve the EIS?

3. Are we correct in believing that the authorization legislation for the project calls for an underground entrance/exit at Canal Road, and not an aboveground structure?

4. Would the operative design plans, currently tasked to the Eastern Federal Lands Highway Division, actually be those already prepared and publicized by Georgetown University? That design is for an elaborate multilevel structure, mostly aboveground.

5. Would, as it appears in your newsletter, the federal and city governments design, build and indefinitely maintain the proposed project?

In addition, I see that your agency has not been in contact with the Foxhall Citizens Association. That association has been the one most interested in the proposed project in the past, and believed its area would be the one most impacted. Touching base with the FCA might be worthwhile.

I would appreciate your views on these particulars by mid-March. Thanks again for your attention and for Project News, which I am duly circulating to Coalition delegates.

Sincerely,

Guy Gwynne
Coordinator, Citizens Coalition

HFO-DC.1

January 5, 1994

Mr. John W. Finney
5275 Watson Street NW
Washington, D.C. 20016-5343

Dear Mr. Finney:

Thank you for your letter of December 23, 1993. I am sorry you have to write to get information about the project; we have been slow in getting out the newsletter as we pledged we would.

We will be publishing shortly the first project newsletter. It addresses some of the questions you asked, but I will repeat them here:

1. We have chosen 4 alternatives to study in more detail in the Draft Environmental Impact Statement (DEIS) now being finalized: the no-build (#1 at the public meeting you attended last February) , the at-grade intersection (#2), the alternative with westbound Canal Rd elevated (#3B), and a new variation of the underpass alternative with all Canal Rd lanes lowered (called #3H). The public agencies involved would not decide on an alternative until the DEIS is circulated and the Public Hearing held.

2. It appears that any build alternative other than the at-grade intersection will require additional funds. DC could supply the additional funds if they wanted, but I doubt that would happen, so it would be up to the sponsor of this project, Georgetown University, to attempt to get additional funds. We could also attempt to scale back one of the interchange alternatives to reduce costs.

3. The formal Public Hearing will be held in the 30-60 day circulation period after the DEIS is made public. No location has been chosen yet.

- more -

4. The proposed DEIS is now being reviewed by the public agencies involved. It is scheduled to be circulated to the public at the end of this winter. Your organization is already on the list of those groups that will automatically be sent a copy.

5. As mentioned earlier, you should be getting a copy shortly.

6. Georgetown University and NPS continue discussions on what 1.02 hectares (2.5 acres) of land around the perimeter of the GU campus will be transferred to NPS to satisfy the 20% local match (regardless of project cost; the value of this land is not an issue). Besides this land, additional land equal in value to the NPS property actually required for the project would be transferred to NPS or they would be given an easement. That would not be determined until an alternative is selected and the property take is known.

7. As seems to happen too frequently, projects like this always take longer than we first anticipate. Right now, if an interchange alternative is selected, we probably would not start construction until late 1995. Check in the DEIS; by that time we might have an estimate of the length of construction and the effect on traffic for each alternative.

Thank you again for your interest in the project.

Sincerely

for Arthur J. Hill, P.E.
Division Administrator

cc: Mr. Jim Sinnette, EFLH
Mr. Jeff Knoedler, NPS
Mr. Tom Roth, DECA, BTCS

✓cc: Mr. Jim Sinnette, EFLH

HFO-DC.1

March 8, 1994

Mr. Guy Gwynne
Coordinator, Citizens Coalition
3710 S Street, N.W.
Washington, D.C. 20007

Dear Mr. Gwynne:

Thank you for your letter of February 28, 1994. I am glad you found the newsletter useful. I will respond to the questions you raised in the order in your letter:

1. The proposed Draft Environmental Impact Statement (EIS) is now being reviewed by the public agencies involved. It is then scheduled to be circulated to the public; the newsletter mentioned this would be in April, but this will probably slip to May-June. The "informational categories" or sections of the Draft EIS have been selected. They generally cover the standard litany of subject areas common to other EIS's you may have seen: purpose and need, alternatives, affected environment, environmental consequences (community, traffic, air, noise, natural resources, 4(f), historic, etc.). Only the three public agencies involved (the Federal Highway Administration (FHWA), the National Park Service (NPS), and the DC Department of Public Works (DC DPW)), and no outside firms, have been involved in the development of the EIS.

2. The short answer is yes, the same agency(ies) will both prepare and approve the EIS. The FHWA has hired a consultant (under contract to our Eastern Federal Lands office), to gather all pertinent information and write the EIS. FHWA, in consultation with the NPS and DC DPW, have reviewed internal drafts of the Draft EIS and will eventually agree on its content and release it to the public. After getting input from interested parties and holding a Public Hearing, we will then select an alternative based on our evaluation of their relative merits.

3. As mentioned in our project newsletter, Section 149(a)(14) of the 1987 Federal Aid Highway Act authorized funds for this demonstration project. This law states "... The Secretary shall carry out a demonstration project in

- more -

the vicinity of the C&O Canal in the District of Columbia for the purpose of substantially improving motor vehicle access at a major traffic generator without decreasing the efficiency of a Federal-aid primary highway." The law does not specifically state the type of interchange to be provided. We could find nothing in the 1987 statute, committee reports, nor documented Member colloquy which limits the improvement to an underpass. If Congress intended to limit the improvement to an underpass, they could have included language to that effect in one of the above mentioned documents. During the EIS process, we will look at reasonable alternatives that can improve access at this location.

4. As part of the preliminary work done by our Eastern Federal Lands office, they brainstormed and developed at least 10 design concept plans which were shared with the 3 involved agencies so we could later agree on which to select to review further in the Draft EIS. One of these was based on the scheme indicated in GU's master plan. Although that particular alternative was not selected to develop further in the EIS, many of the alternatives studied were above ground and one will be included in the Draft EIS.

5. It is currently envisioned that another consultant, under contract to our Eastern Federal Lands office, would be hired to design the alternative selected (if a build-alternative is selected), another contractor under contract to EFLH would actually construct it, and the D. C. Department of Public Works would then take over responsibility to maintain it. It remains to be worked out where the northern limits of their responsibility would end.

Thank you again for your interest in the project, and your recommendation to touch base with the Foxhall Citizens Association. We met with representatives of their group last winter and have sent them a copy of the newsletter.

Sincerely,

Arthur J. Hill, P.E.
Division Administrator

cc: Mr. Jim Sinnette, EFLH
Mr. Jeff Knoedler, NPS
Mr. Tom Roth, DECA, BTCS



The Georgetown
Reservoir Neighborhood
Association, Inc. WASHINGTON, D.C. 20007

March 21, 1994

Arthur J. Hill, P.E.
Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street, N.E.
Washington, DC 20002

Dear Mr. Hill:

The Reservoir, the newsletter of The Georgetown Reservoir Neighborhood Association, Inc., is preparing an update on the demonstration project that would construct an entrance to Georgetown University on Canal Road. I am the editor of *The Reservoir*.

The Georgetown Reservoir neighborhood surrounds the reservoir on MacArthur Boulevard, and will feel the effects of any changes made to existing traffic patterns on Canal Road. A map showing our neighborhood is on page 2 of the enclosed page from the December 1992 issue of *The Reservoir*.

Just a few days ago, I learned that you publish and distribute a newsletter on the subject. I would like to be added to the list of those who receive the newsletter. Any other written material that you have explaining the project and its current status will be helpful

Thank you.

Sincerely,

Don Melvin
4641 Greene Place, NW
Washington, DC 20007-2510
202

HFO-DC.1

April 13, 1994

Mr. Don Melvin
Editor, The Georgetown Reservoir
Neighborhood Association, Inc.
4641 Greene Place, NW
Washington, D.C. 20007-2510

Dear Mr. Melvin:

Thank you for your letter of March 21, 1994 (we just received it yesterday). I am enclosing a copy of the recent newsletter - the only one distributed to date. I have also enclosed a copy of the informational packet handed out at the February 1993 public information meeting, where we displayed renditions of the various alternative then being considered.

Thank you for your interest in the project. We will place you on our mailing list to receive any future newsletters and notification of other project related activities, such as availability of the Draft EIS and date of the Public Hearing. If you have any specific questions about the project not answered by the enclosures, give Mr. Jerry Yakowenko of my staff a call at (202) 523-0163.

Sincerely,

for Arthur J. Hill, P.E.
Division Administrator

Enclosures

cc: Mr. Jim Sinnette, EFLH
Mr. Jeff Knoedler, NPS
Mr. Tom Roth, DECA, BTCS

Citizens' Concerns:
Canal Road Overpass

6.15.94

Flaws and Omissions in the Review Process:
Canal Road Overpass Project
for Benefit of Georgetown University

I. **Flaws in the proposed EIS**

The proposed EIS fails to address important alternatives to the project. By so delimiting the options the analysis prejudices any assessment in favour of the project. The material omissions include:

A. Energy-efficient or environmentally-beneficial alternatives

1. Increased mandatory car pooling by University employees and persons regularly working on the campus.

2. Mandatory increased use of public transportation by the above persons.

Both options could not only reduce congestion, and hence the need for the overpass, but would also contribute to acknowledged goals of reducing pollution in the District and the greater metropolitan area.

Omission of such options is inexcusable.

B. Reduction in staff/employees/renter-occupants on the campus

1. The University presently maintains on its campus numbers of persons working, or sojourning, there in violation of the local zoning regulations, including, but not limited to, the staff and guests of the Marriott-operated hotel.

Any EIS should include the impact of eliminating such traffic. Compliance by the University with zoning regulations and its Campus Plan would itself materially reduce traffic flows and hence any need for the project.

2. Second, a satellite campus must be considered, i.e. the option elected by urban universities elsewhere to displace some operations to less congested locations.

Such an option would materially reduce traffic, as well as the adverse impact of existing University activities upon the surrounding neighborhoods inconsistent with the Campus Plan and the zoning regulations.

Traffic generated by activities in violation of zoning rules should not be reckoned as traffic to be mitigated by new construction; rather that traffic itself should be eliminated.

C. *Traffic Management Options*

The option of staggered working hours to be required of the campus personnel is conspicuously absent. This is an option which has been invoked in other communities in order to control congestion caused by concentrated employment sites.

D. Compatibility/Reconciliation with medium- and longer-term traffic forecasts

It is understood that the reviewers have not verified the future occupancy levels on the GU campus, as based upon the projected construction schedule embodied in the Campus Plan, in order to test the impact of the greater traffic levels upon the usefulness of the proposed overpass.

II. **Absence of tests of accuracy**

Mr. Mirack indicated that no hearing will be held in which sworn testimony is required. In particular, Mr. Mirack indicated that there are no sanctions for false

filings by the University, nor is there to be any opportunity for cross-examination. Specifically, Mr. Mirack has noted the following:

NO opportunity for cross-examination

NO opportunity for discovery

NO sworn statements or testimony

NO penalties for perjury or false filings

Given the prior history in other regulatory proceedings of grave errors, distortions, and false statements by the University or its counsel the Administration fails to protect the public interest by permitting unverified data or information to be used as the basis for decision in this proceeding.

The community is ready to supply chronologies. I note in particular that in an earlier case the University's consultant acknowledged having excluded key options from an EIS under instruction from his client.

In view of the prior pattern and practice the Department fails to ensure a credible basis for any public review of the proposal and assessment of the information supplied by the developer.

III. **Exclusion of interested parties**

Finally, we are disturbed that the service list may not contain groups with an active interest in the integrity of Canal Road and the C&O Canal park -- the Sierra Club or the Appalachian Mountain Club, for example.

HFO-DC.1

July 20, 1994

Dr. Thomas Stauffer
1640 35th Street, N.W.
Washington, D.C. 20007

Dear Dr. Stauffer:

Thank you for your fax dated May 25, 1994 (as updated by your June 7 revision given to my Mr. Frank Mirack at his meeting with you and representatives of the Citizens' Coalition on June 7).

We will be publishing shortly the second project newsletter which will lay out our schedule for the next six months. As we discussed at our meeting, we will hold more public information meetings before formally endorsing a Draft Environmental Impact Statement (DEIS) and sending it around for public comment - so you will also have an opportunity to present your group's opinion during these meetings and when the DEIS is formally made public.

Concerning the points raised in your fax as revised:

1. As mentioned in our first newsletter and as discussed at our June 7th meeting, besides the no-build alternative, the three alternatives selected to be reviewed in detail are: an at-grade intersection, an overpass, and an underpass. We currently feel that these are the most reasonable alternatives to satisfy the purpose of the project which is to improve vehicular access to Georgetown University at Canal Road. This satisfies a need to move much of the university-generated traffic from local Georgetown neighborhood streets to a more logical arterial route - Canal Road - which is the functional purpose of such a road. This improvement merely implements one of the

features included in the most recent BZA-approved Master Plan for the University. Based on your concerns, our staff reconsidered the alternatives of car pooling, public transportation, satellite campus, etc. to see to what extent these would satisfy the need for the project. However, we still feel these measures will not satisfy the purpose or need. Many of the "energy-efficient" alternatives you mentioned are themselves features in the approved plan which, nevertheless, still includes an improved Canal Road entrance as part of the overall negotiated compromise. We feel the BZA process is the most appropriate forum to have the community reach consensus on the level of traffic generated by the University.

2. Concerning the issue of traffic generated by uses in violation of current zoning for the university, we feel that this issue is beyond the scope of our project. If, as you say, there are such illegal activities, then you should pursue this with the D.C. Government.

3. As we mentioned in our meeting, what we have developed so far in the DEIS is based on our conclusion that the additional 242,000 m^2 building floor area will not appreciably generate additional vehicular traffic at the Canal Rd. entrance since the number of parking spaces is capped. In an attempt satisfy your concerns about the traffic generated by activities making up the additional floor space, we are having our staff relook at our current conclusion to see if it makes sense for the types of usages included, and in any case, to better describe the types of activities making up the increased floor space (for example, some of the increased space is student housing and replacement parking for surface lots-neither of which generates additional vehicular traffic).

4. Concerning the issue of sworn testimony, etc. which you note our process does not include, we have informally checked with our legal counsel concerning the applicability of the Administrative Procedures Act to our process as you suggested. This Act covers the handling of disputes and claims and does not cover the gathering of information during project development. We rely on the dissemination of environmental documents and on other public forums to give an opportunity for interested parties, such as your group, to add additional information, and to challenge our assumptions and the statements of any other party. Through meetings such

- more -

as ours last month, through public information meetings, through formal public hearings with written transcripts taken, and with the requirement for major comments on the DEIS to be addressed, we hopefully will air all viewpoints.

5. We will add to our mailing list the two interested parties you recommended be added.

Thank you again for your interest in the project.

Sincerely

for Arthur J. Hill, P.E.
Division Administrator

cc: Mr. Jim Sinnette, EFLH
Mr. Jeff Knoedler, NPS
Mr. Tom Roth, DECA, BTCS

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Advisory Neighborhood Commission
2E
3265 S St. NW - Washington, D.C. 20007
Telephone 202-
Fax 202-

August 31, 1994

Mr. Jim Simmette
Federal Highway Administration
Eastern Federal Lands Highways Division
21400 Ridgetop Circle
Sterling, VA 20166-6511

Dear Mr. Simmette:

I recently requested and received a copy of the Draft Environmental Impact Statement for the Canal Road Entrance Project for Georgetown University. I appreciated the prompt response by your office.

I understand that data used in the statement was taken from the Georgetown Master Plan for 1989. My next questions are:

- What is the basis of the information in the report regarding the square footage and the number of people on campus? Was it the current numbers or a projection, and if a projection, for how many years into the future?
- May we have copies of the pages in the Master Plan identifying the basis of the information?

Our public meeting is scheduled for September 8. Please send us the information in time to read and absorb it before then.

Thank you very much.

Sincerely,

Westy Byrd

Westy Byrd
Commissioner, 2E-04

_____BURLEITH / FOXHALL-MACARTHUR / GEORGETOWN / HILLANDALE_____

COMMISSIONERS:

Dianne Sawaya, District 1 | Ted Jacobs, District 3 | Beverly Jost, District 5 | ·····, District 7
Oscar Turner, District 2 | Westy McDermid, District 4 | Ed Schwartz, District 6 | ·····, District 8

HFO-DC.1

September 26, 1994

Ms. Westy Byrd
Commissioner ANC 2E04
3426 Reservoir Road N.W.
Washington, D.C. 20007

Dear Ms. Byrd:

Thank you for your September 6 letter requesting information on the assumptions used in the traffic study for the proposed improvements to the Georgetown University Canal Road Entrance.

We presume, as you are a member of the local ANC, that you have access to the Georgetown University Master Plan (1990) and the BZA September 1990 Decision on that plan. These form the basis for our traffic conclusions. We can provide you with complete copies if you call; here are excerpts from those documents that specifically touch on the issues you are interested in. Also enclosed is a copy of the handout from this month's public informational meeting; page 3 discusses existing and forecast conditions and assumptions made.

Sincerely,

Arthur J. Hill, P.E.
Division Administrator

Enclosures

cc: Mr. Jim Sinnette, EFLH
Mr. Jeff Knoedler, NPS
Mr. Tom Roth, DECA, BTCS, DED

Foxhall Community Citizens Association

Serving Foxhall Village, Colony Hill, and Indian Rock Terrace

1612 44th Street, N.W.
Washington, D.C. 20007
(202)

8 September 1994

Mr. Arthur Hill, Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street, N.E.
Washington, D.C. 20002

Dear Mr. Hill:

Prior to the public meeting on September 14, the Foxhall Community Citizens Association has made a preliminary analysis of the ***Transportation Technical Report*** and the Georgetown University - Canal Road Entrance Project ***Newsletter***. In general, we do not dispute the results of the two major studies; however, we find many of the underlying assumptions undocumented, incomplete, or inaccurate. We will prepare comments on specific aspects of the ***Transportation Technical Report (TTR)*** after the September 14 public meeting.

Our comments/questions are listed as follows:

(1) For the school year ending in June 1994, what were the actual figures for the number of undergraduates (full-time equivalents), the number of graduate and professional students (excluding the Law School), and the number of employees of the university and Medical Center? Is the faculty included in the employee category? If not, how many faculty members (full-time equivalents, and excluding Law School faculty) What are the projections for these categories in 1996 and 2016? What is the source for these projections?

(2) What is the difference between a "local street" and a "principal arterial"?

(3) Although the source of the "Land Use Plan" in Figure 3 of the ***TTR*** is listed as the D.C. Office of Planning, was the actual "map" obtained from them or was the map generated from data provided by them? The map contains numerous inaccuracies.

(4) Why were the Reservoir Road entrances left out of the Traffic Analysis and the Origin-Destination Survey?

(5) Why is Reservoir Road considered a "local" route? It and Canal Road are the only through streets crossing Glover-Archbold Park in this area. Cathedral Avenue, about three-fourths (?) of a mile to the north, is the next through street crossing Glover-Archbold Park.

(6) MacArthur Boulevard between Foxhall and Reservoir Roads is not a four-lane arterial. Parking is allowed on both sides of the street making it a one-lane road in either direction except in the morning rush hour when parking is prohibited, thus providing two eastbound lanes for traffic. Foxhall Road has four lanes only from Reservoir Road north to Whitehaven Parkway, the equivalent of about four or five city blocks. North of Whitehaven Parkway, Foxhall Road has only two lanes with no street parking up to about where Lowell Street comes in. From the intersection with MacArthur Boulevard north to Reservoir Road, Foxhall has parking on both sides of the street, mostly restricted to cars with residential parking stickers with some spaces having 30-minute parking restrictions in front of the small commercial zone between Q Street and Greenwich Parkway.

(7) The GUTS Shuttle Routes depicted in Figure 9 could not be entirely accurate for the route along Reservoir Road west of the university. Even in 1989 when the university's Transportation, Traffic and Parking Study was done, the buses could not use 44th Street between Reservoir Road and the intersection with MacArthur Boulevard and Foxhall Road because this street is limited to one-way traffic for a block at both ends.

(8) What were the actual numbers of students, faculty, staff, and visitors who were queried as part of the ***Georgetown Area Access Alternatives Study***? What are the figures for the 1993/94 school year?

(9) If one takes the latest figures provided in the ***TTR*** (5,627 undergraduates, 2,060 graduate and professional students, and 6,800 employees = 14,487) for the number of people on the campus and apply the percentage (50%) of those who travel to and from the university by car, one obtains 7,244. With the maximum number of parking spaces on the campus limited to 4,080, about another 78% of people may be forced to find parking elsewhere, such as in residential areas.

(10) Although pedestrian traffic may be high near the university, is there a breakdown of the number of pedestrians who walk to the university from their cars, which may be parked several blocks away?

(11) If the COG growth rate of 1.2% annually is not appropriate for the Georgetown area, how do you account for the slow-moving traffic on eastbound M Street during the morning rush hour, westbound M Street during the afternoon rush hour, both lanes of eastbound Canal Road (between Foxhall Road and the Whitehurst Freeway) during the morning rush hour, the left lane of Canal Road (also between Foxhall and the Freeway) during the afternoon rush hour, the eastbound lanes of MacArthur Boulevard and where it merges into Foxhall Road during the morning rush hour, or the southbound lane of Foxhall at MacArthur during the morning rush hour? What will happen when the vacancies in the office buildings along K Street in Georgetown are filled?

(12) Why is the new South Entrance needed if, as the *TTR* claims, the university's Master Plan does not propose any expansion in the capacity or functions of the campus, student enrollment is not going to be increased, the number of faculty will experience "little change"? Also, why if the number of parking spaces is limited, and the existing spaces are already occupied to capacity? When traffic volumes have showed a decline? When university-generated traffic will not increase in 1996 or 2016 either daily or during the peak hour?

We hope that you will be able to address these issues at the September 14 public meeting and look forward to seeing you there.

Sincerely,

Scott Polk

Scott Polk
Acting President, FCCA

HFO-DC

February 28, 1995

Mr. Scott Polk
President
Foxhall Community Citizens Association
1612 44th Street, NW
Washington, D.C. 20007

Dear Mr. Polk:

Thank you for your September 8 letter on the proposed project. We will try to respond to your questions in order:

1. For the 1993-94 school year, Georgetown University estimates that the number of full-time equivalent undergraduates was 5,232 FTE's, and for graduate students it was 2,729 FTE's. The number of employees, staff, and faculty at the University was 8,114 (including part-time employees), with 5,217 at the Medical Campus and 2,897 at the Main Academic Campus. These are close enough to our "starting point "(1996) for our purposes.

For our planning period (through 2016), we used the BZA approved caps or Master Plan projections as ballpark figures. The undergraduate student FTE is projected to increase by 340 FTE's. The number of graduate students was roughly projected to stay constant. The total staff, employees, and faculty was projected to increase to 7,500.

Georgetown attributes the difference in the projection (7,500) and the actual 1993-94 numbers (8,114) to the unexpected increase in the number of part-time employees. In addition, in early January, the Medical Campus laid off 231 employees that were included in the 8,114 figure. No major increases in employment is expected at the University.

- more -

2. Think of a vascular system. Arterials are like blood arteries/veins which carry the main traffic flow; local (neighborhood) streets are like capillaries which have limited capacity and serve localized areas of the body. A local street primarily serves as direct access to individual residences, businesses or other abutting property which tend to generate few vehicle trips per property. A local street offers the lowest level of mobility. Through traffic, if any, is local in nature and extent. Regional, intrastate or interstate traffic is usually deliberately discouraged. An arterial carries most of the trips entering and leaving an urban area. Major generators are better served by arterials rather than directing traffic by circuitous routing through local neighborhood streets. (We note that other Universities in the city are served primarily by arterial routes).

3. The land use information was obtained directly from the "Land Use Plan". However, this was in a generalized form. Field surveys of the area have been completed to provide more detailed information on land uses in the area.

4. The purpose of our draft EIS is to evaluate the impacts associated with the changes at the Canal Road entrance. Under the current assumption, the access between the Medical Center and the Academic Campus is restricted to those with keycards. With this restriction, the traffic into/out of the Reservoir Road entrances to the Medical Center is assumed to remain the same with or without this project, as part of the background traffic. Thus, the traffic into and out of these entrances was not included in the Origin-Destination Study. However, other traffic to and from the Main Academic Campus using Reservoir Road was included in the analysis. This traffic would be affected by the changes in the Canal Road entrance and the anticipated closing of the Prospect Street entrance.

5. Reservoir Road is not a local route; it is an arterial. (Reference on p.4 of the Transportation Technical Report is incorrect).

6. We are aware of this, and our analysis takes this into account. This will be clarified in the description provided in the Transportation Technical Report and the DEIS.

7. The current routes of the GUTS buses were obtained from Georgetown University. The route shown on 44th Street was incorrect and will be removed from Figure 9.

8. We do not know how many people were queried as part of the Georgetown Area Access Alternative Report. As part of our Origin and Destination (O&D) Study completed in January

- more -

1993, 1,100 origin-destination cards were handed out to drivers entering both the Canal Road and Prospect Street entrances. Of these, about 400 responses were received, of which 375 cards were used in our study.

9. Remember (1) that the 50% figure you cite is for "commuters" and does not include students living on campus, (2) that all students, faculty, and staff are not on campus every day, and (3) that people who drive to the University do not always occupy a parking space all day. Based on analysis of vehicle trips in to and out of the University on a daily basis, the parking spaces are used by more than one vehicle during the day. Thus, more than 4,080 vehicles can use the 4,080 parking spaces. Your estimate of 78% (about 3100 cars) finding parking in the residential areas is high. Also, our project just focusses on the shift in the entrance; any additional traffic parking on neighborhood streets would occur with or without our project.

10. We did not collect information on parkers on local Georgetown streets whose ultimate destination was Georgetown University. This information is not needed to determine the relative impacts of the proposed project since these travel patterns will not be affected by a build alternative.

11. The COG growth rate was not considered appropriate for the projections for the "peak-hour" because of the capacity limits on the streets in the Georgetown area. Only so much traffic can use a traffic lane during an hour. As you noted, many of these streets are already at "capacity" during the peak hour. The growth in traffic may occur in the "peak period" which is the two to three hour period in the morning and afternoon. The growth that might want to occur in the one peak hour will likely occur in the next hour of the peak period. This is called the "spreading of the peak hour demand". This is one possibility that might happen as buildings become occupied. Shifts to other modes of travel may also occur.

12. The purpose of the Proposed Action is to improve motor vehicle access to Georgetown University from Canal Road. This would reduce University-generated traffic on Prospect Street, which is a residential street and move that traffic to an arterial, Canal Road. This is a desirable goal regardless of the level of traffic generated by the University.

Sincerely,

for Arthur J. Hill, P.E.
Division Administrator

DATE September 12, 1994/3:08 PM

FACSIMILE COVER SHEET

NAME Mr. Gerald Yakowenko
ADDRESS FHA/DC
FAX NUMBER 523-0181

FROM: Dr. Thomas Stauffer (Cloisters Homeowners Association)
1640 35th Street, N.W.
Washington, D.C. 20007

Telephone Number: (202)
Facsimile Number: (202)

Cover sheet plus ___0___ page(s).

1. **Cadastral information**

Would you please make available a map or plat from which it can be determined where are the boundaries of the lands to be crossed or built upon for the proposed project.

2. **Ownership**

Who owns the lands in question? Insofar as the University does not own the lands, please indicate why there is a reasonable expectation that the University will obtain title or rights of access.

3. **Premature hearings**

If the University cannot prove right of access or show easements why should the public be burdened with responding to a project which is still speculative?

4. **Funding**

Kindly show when the local match funds were made available and by whom. If they have not been furnished, please explain why.

Thomas R. Stauffer

HFO-DC.1

September 27, 1994

Dr. Thomas Stauffer
1640 35th Street, N.W.
Washington, D.C. 20007

Dear Dr. Stauffer:

This is in response to your September 12, 1994 fax.

I will answer your questions in order:

1. Enclosed is a map roughly showing the area to be crossed by the project.

2. The project will require land belonging to - depending on exact right-of-way needed for project - Georgetown University, the Riders Fund, National Park Service, or the District of Columbia. Any property from the Riders Fund needed for the project would be acquired by the D.C. Government, using normal property acquisition procedures; in the case of NPS property, Georgetown University would grant a scenic easement, or other interests in lands, that is approximately equal in value to the access easement needed across NPS land; Georgetown University will provide any University property needed for the project.

3. As indicated above, the University does not have to acquire right-of-way from private parties such as the Riders Fund, since this will be done by the District. Since right-of-way acquisition typically does not start until the environmental process is complete and we know the amount of property needed, discussion of the project now is not speculative.

4. As mentioned to you on September 9th, D.C.'s "matching" share will be considered provided when Georgetown University dedicates 1.0 hectare (2.5 acres) of land to the District as permanent scenic easement (which will then be transferred to the NPS).

- more -

This has not yet occurred and need not occur until right-of-way and construction are authorized later.

Sincerely,

for Arthur J. Hill, P.E.
Division Administrator

Enclosures

cc: Mr. Jim Sinnette, EFLH
Mr. Tom Roth, DECA, BTCS, DED
Mr. Jeff Knoedler, NPS

To: Mr. Arthur Hill, Division Administrator
Federal Highway Administration

September 28, 1994

From: Judith Dollenmayer office tel.(202)
Secretary, Georgetown Reservoir Neighborhood Association, Inc.
1517 Elliot Place NW
Washington DC 20007-2508

Subject: Comments on Proposed Canal Rd. Entrance Project, Georgetown University

1. Overall, the estimated impact of any of the three proposed solutions appears merely to **shift a disproportionate burden of traffic from East to West and South of campus.** The plans would reduce the share of traffic leaving and entering GU by the Prospect Street (East) side, while more than doubling the share of GU traffic on the Foxhall/MacArthur (West) side of the campus. It is difficult to see the merit of this, at proposed expenditure levels, rather than merely attempting to **evenly distribute future traffic growth** to and from campus.

2. From conversations with your staff (very knowledgeable and patient with our questions, by the way) at your 9/14/94 meeting at Mt. Vernon College, I got the impression that your studies of existing traffic flow AM and PM rush hours **seriously underestimate, or have not examined, the flows from MacArthur and Reservoir** that create huge bottlenecks (especially AM) at Foxhall and MacArthur. Backups that often extend from Foxhall and MacArthur back to MacArthur and Elliot Pl. or farther begin most weekdays at about 7:45 a.m. and often continue until 9:30 a.m. or later. Adding 2 GU-bound cars a minute to this would possibly bring bumper-to-bumper to a standstill. AM rush hour is far worse because 7, and possibly 8, educational facilities use Reservoir, MacArthur or Foxhall to get students to school at roughly the same moment: Our Lady of Victory (MacA.), St. John's Development Ctr.(MacA), The Lab School of Washington (Reservoir near Whitehaven Pkwy), Georgetown Day School lower school (MacA), Hardy School (Q at Foxhall), a private drug treatment day facility and the pending reopening of the Psychiatric Institute of Washington (MacA.near Foxhall). Hundreds of students are involved. This fall, Georgetown Day School began opening at 8 instead of 8:15 a.m., because backups have been a serious problem in the neighborhood for years.

3. Even under the most elaborate option, wouldn't traffic northbound from the GU campus to other parts of Georgetown have to turn **back** through Georgetown streets (e.g. M St. to the northgoing advance-green light allowing a left turn onto 33nd Street) once it has exited to the south via Canal? Imagine what this will do to evening rush-hour traffic coming west along M to either NW DC or Key Bridge, and (on Friday through Sunday nights) coming from VA across Key Bridge into Georgetown from late afternoon on. M St./Key Bridge/Canal Rd/exit from Whitehurst is already a huge choke point both AM and PM rush hours.

4. There seems a **lack of coordination** between what FHA proposes and **what GU itself might do, on campus, to relieve congestion and speed entrance and exit flows.** An FHA staff member explained that you have no authority to look at anything but solutions on federal property (?). However, it seems merely common sense to sit down with GU authorities and see what might be done to redistribute flows rather than to dump all of them southward onto already-crowded Canal Road. Item: The medical school and hospital, I understand, would continue to enter and exit by Reservoir Road. Yet there is an access road (now partially impeded) from the GU lower campus up to the medical area (I have used it after playing on the tennis courts at the lower campus) that might be adapted with a key-card system to facilitate traffic flows to all exits, not just Canal.

5. I realize that neither the federal nor the DC government is likely to have funds to realize our worst fears of the massive expansion of essentially residential streets or the breaching of historic areas such as the C&O Canal park and Canal Road. However, our neighborhood wants to be on the record that, whatever the solution in this situation, no solution will be acceptable that adds pressure for the "freewayization" of MacArthur or the doubledecking of Canal Road at some future date.

Thanks for the opportunity to comment on the proposed alternative plans. We look forward to the meeting on October 12.



Copies to Tom Silverstein, President, Georgetown Reservoir Neighborhood Assn.;
Janet Nash, VP; James Pagel, Treasurer.

January 23, 1995

Mr. Tom Silverstein
President
Georgetown Reservoir Neighborhood
Association, Inc.
4621 Q Street, NW
Washington, D.C. 20007-2508

Dear Mr. Silverstein:

This is in response to Ms. Dollenmayer's letter of September 28, 1994. We will try to respond to the comments in the order of the letter:

1. The Proposed Action includes the reconstruction of the Canal Road entrance and the anticipated closure of the Prospect Street entrance. The Canal Road entrance would then be the only entrance to the Main Academic Campus. A result of the Proposed Action would be to redistribute the travel patterns of drivers to and from the Main Campus. The impact of this redistribution on the streets on the west side of the Campus varies by the hour of the day. The impacts are greater in the morning peak hour. The benefits of the redistribution on the streets on the east side of the Campus also vary by the hour of the day. The benefits are greatest in the afternoon peak hour.

   Several alternatives which would shift the distribution of traffic have been suggested during the informational meetings held in September and October of 1994. Such alternatives have included the alternatives considered in the 1982 Environmental Assessment (EA) as well as variations of these options. The current basis of our analysis, which includes the closing of Prospect Street and the restriction of access between the Medical Campus and the Main Academic Campus, is in response to perceived concerns from the community about the 1982 EA. Any of the suggested new alternatives would have to include another entrance to the Main Academic Campus. This could be provided by either leaving the Prospect Street entrance open or changing the intra-Campus movements. In any case, it appears that these alternatives - as well as those previously studied - would require modification of current rulings and directions by the Board of Zoning Adjustment (BZA) regarding operation of the entrances and intra-Campus movements.

2. We have always included the MacArthur/Foxhall intersection and other major intersections west of the university in our analysis. We believe our traffic figures accurately reflect the shifting of traffic anticipated as a result of our proposed project. Our analysis to date was also based on our best estimate of the background growth of traffic with or without our project. In response to neighborhood concerns about traffic, this is being reviewed once again. Additional traffic counts have been collected, including information on queuing of traffic on MacArthur Boulevard and Foxhall Road during peak periods. The analysis presented will be reviewed in light of these counts. Additionally, we will probably use a higher estimated background traffic figure based on a more conservative (i.e. worst case) estimate, just for the sake of argument.

3. The vehicle trips you refer to are those to the northeast using Wisconsin Avenue or local streets. During the AM peak hour, about 105 vehicles currently exit the Main Academic Campus and about 450 vehicles exit in the PM peak hour. Of these, 12.4% use Wisconsin Avenue or local streets to the northeast. This translates into 13 vehicles in the AM and 56 vehicles in the PM peak hours. With the closing of the Prospect Street entrance and the redistribution of traffic, it is estimated instead that 9.8% of the vehicles exiting from the Canal Street entrance would use Wisconsin Avenue or local streets. This amounts to about 10 vehicles in the AM peak hour and 44 vehicles in the PM peak hour. It is projected that half of these would turn west and half would turn east from the entrance. In the PM peak hour, for example, about 22 vehicles would potentially be turning north on 33rd Street. However, some of these could continue east on N Street and use other roads to travel north. This traffic has been already included in our estimates of Level Of Service for the M St./Key Bridge intersection for all alternatives.

4. We have gotten information from the university to the extent necessary for development of the Draft EIS. What you characterize as lack of coordination is just a situation where we cannot make the University nor the D.C. government do anything by fiat. Additionally, BZA has approved certain restrictions on the GU campus plan based on perceived neighborhood concerns. Any change therefore, involves many parties and a certain amount of compromise. It would thus be necessary to clarify the University's willingness to test and implement any such options before any analysis could be completed of the possible traffic patterns and loadings. It would also require coordination between the University and the BZA.

Following are the initial responses of the Georgetown University to a similar question from the Citizens' Association of Georgetown. Canal Road Usage - As part of the authorization of the Leavey Center garage (Podium A), the Campus Plan and the BZA Orders authorizing construction required the installation of a transportation management system which would prohibit free-flow traffic and maintain the balance of traffic flow as it existed at the time of construction. A key card system was installed to maintain the balance of traffic as it existed at the time of construction.

Patients are not now and would not be allowed to access the Medical Center from the South Entrance. To the extent that faculty and staff currently use the Prospect Street and Canal Road entrances; i.e., those who live in Virginia or Southern Maryland; and access the Medical Center parking in the Leavey Center by using the key card access system, these people would continue to access the Medical Center parking areas by using the South Entrance.

Free exchange - The University believes that the impact of allowing free and unrestricted movement of University employee traffic would be minimal. However, this cannot be validated until the South Entrance is constructed.

Primary Road - The future plan of the road network with primary entrances designated at the South Entrance and Entrances One and Four, along Reservoir Road, is still envisioned. Currently, and as mentioned above, the University is precluded from permitting free flow traffic. However, with BZA concurrence and at the request of the community, the University is willing to test this option.

5. Your concern about freewayization or double-decking of approach roads will be noted in the DEIS, in the chapter on "Comments and Coordination."

Sincerely,

for Arthur J. Hill, P.E.
Division Administrator

cc: Mr. Jim Sinnette, KDLH
Mr. Don Goffredi, DECA, BTCS, DED
Mr. Jeff Knoedler, NPS
Ms. Judith Dollenmayer

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Advisory Neighborhood Commission 2E
3265 S St. NW - Washington, D.C. 20007
Telephone 202-
Fax 202-

October 11, 1994

Mr. Arthur Hill
Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street, NE
Washington, D.C. 20002

Dear Mr. Hill:

I received the packet containing the assumptions being used to assess the impact of an overpass on Canal Road for Georgetown University.

I have the following comments:

1. You are assuming that full-time equivalent enrollment will increase by 340 students.

   Question: What about part-time students, night students or any type of student under a classification other than full time?

2. You are assuming that faculty and staff at the University will increase by 700 people.

   Question: What about the increase in people at the Medical Center? The Medical Center is going to add 984,992 square feet to its existing building requiring additional staff.

3. You are assuming that the square footage of the campus will increase by approximately 2.6 million square feet to "replace obsolete space, relieve overcrowding, provide dormitory space and to supply needed support space such as additional library space and athletic facilities."

   According to the campus plan, the University intends to add 3,896.622 million gross square feet to their campus between 1989 and 2010, (Campus Plan, page 71). You have underestimated the development by approximately 1.3 million square feet. The GSF figure should be used unless the space is going to be used only for storage. It is my contention that the University is measuring each building from Resevior Road and claiming that everything down to Prospect Street is "underground." Obviously, the space is not underground.

   3,896.622 million GSF is larger than some "city" developments in Virginia. Clearly the use goes well beyond "relieving overcrowding." The list of new buildings in the campus plan confirms this contention. In fact, ANC 2E does not have a copy of the campus plan, but it is my recollection that the "massive" podiums to be constructed specifically have no intended use in order to provide "maximum" flexibility to the University.

_____BURLEITH / FOXHALL-MACARTHUR / GEORGETOWN / HILLANDALE_____

COMMISSIONERS:

Dianne Sawaya, District 1 Ted Jacobs, District 3 Beverly Jost, District 5 Rod Johnston, District 7
Oscar Turner, District 2 Westy Byrd, District 4 Ed Schwartz, District 6 Craig Davitian, District 8

4. You are assuming that the BZA set a cap of 4,080 parking spaces for the campus.

   First, in a review of the campus plan, the existing parking spaces (after decommissioning surface lots) is 2380, (page 71). The total University future parking facilities is listed at 2275, (page 71). This adds up to 4,655 total parking spaces which is 1) at odds with your number of 4,080 and 2) at odds with the University total which is listed at 4,480 (page 71).

   Second, you assume the University is going to abolish valet parking in order to keep the number of cars coming to the campus at a minimum. Would you point to the section in the campus plan which states they are prohibited from continuing valet parking?

   Third, you assume that any person having an affiliation with the school either parks on the campus or gets to the school by means other than a car. This is an incorrect assumption. Students who live "off campus" can park in the neighborhood while attending school and in some cases, have "neighborhood parking stickers" which is evidenced by the number of "out of state" cars with Zone 2 stickers. Faculty and staff park in our neighborhood. One staffer told me that she moves her car every 2 hours. A professor might have a 2 hour lecture enabling him to park "worry free." Medical staff are seen regularly in their green suits parking in the neighborhood. If they receive one parking ticket a week at a cost of $20.00, this is probably cheaper than the cost of parking on the University campus. Hundreds of cars park in our neighborhood and the University affiliated persons walk to campus.

   The assumption that the number of cars in the neighborhood associated with the University is limited by the number of parking spaces on the campus in WRONG. Traffic counts taken at the entrance to the University would not take into account the number of University-related vehicles parking in our neighborhood.

5. After assuming a) an increase in enrollment, b) an increase in faculty and staff, c) a massive increase in square footage and d) an increase in the number of parking spaces, you conclude there will be no increase in "University-generated vehicular trips" through 2016.

   This conclusion is based on the faulty assumption that all University generated vehicular traffic will park on the campus.

I would certainly appreciate an opportunity to discuss these comments with you. Any EIS done using this incorrect data and assumptions would inevitably come to a faulty conclusion.

Sincerely,

Westy Byrd (dlo)
Westy Byrd
Commissioner 2E-04

cc: The Honorable Eleanor Holmes Norton
The Honorable Betty Hager Francis
District of Columbia City Councilmembers
ANC 2E Commissioners

_____BURLEITH / FOXHALL-MACARTHUR / GEORGETOWN / HILLANDALE_____

COMMISSIONERS:

Dianne Sawaya, District 1 Ted Jacobs, District 3 Beverly Jost, District 5 Rod Johnston, District 7
Oscar Turner, District 2 Westy Byrd, District 4 Ed Schwartz, District 6 Craig Davitian, District 8

HFO-DC.1

January 24, 1995

Ms. Westy Byrd
Commissioner ANC 2E-04
3265 S St. NW
Washington, D.C. 20007

Dear Ms. Byrd:

Thank you for your October 11 letter on the proposed project. We will try to respond to your comments in order:

1. In its 1990 ruling on the Bicentennial Master Plan, the Board of Zoning Adjustment (BZA) ruling on page 9 set a cap on the increase in student enrollment in terms of undergraduate Full Time Equivalent students, and also defined what is not included in that figure. The BZA requires enrollment to be calculated in terms of Full Time Equivalents (FTE). This relates the course load of part-time students to the normal full-time course load of the individual students of the University. Thus, there are more total students taking courses than FTE students, although the FTE cap indirectly also limits these other categories. We estimate there are currently about 9600 students total and page 9 of the BZA ruling shows a projected student enrollment of 10,000.

2. The 1990 BZA ruling on the increase in faculty and staff for the University included both the Medical Campus and the Main Academic Campus.

3. The Georgetown University Bicentennial Master Plan proposes to add, by the year 2010, approximately 270,000m² [2.9 million gross square feet (GSF)] to the Academic Campus and about 84,000m² [0.9 million GSF] to the Medical Campus. This amounts to about 354,000m² [3.8 million GSF]. Based on the BZA analysis process, the proposed square footage was also shown adjusted to Applicable Zoning Area (AZA). This decreases the GSF by the areas not counted in the zoning calculations (roughly those floors below the ground level adjacent

- more -

to each individual building - not everything below Reservoir Road). Note, for example, Building D1. On page 58 of the Master Plan, it is entirely below the Reservoir Road elevation, but on page 69, AZA is still indicated. The resulting AZA area is mentioned in the BZA ruling as approximately 240,000m² [2.6 million square feet] AZA. We had mistakenly referenced that lower figure earlier without explanation, but agree with you that the gross square foot number gives a more realistic representation of the extent of building size.

As noted on page 9 of the BZA ruling of November 1990, "the bulk of the projected growth in building space results in the need to replace obsolete facilities, to relieve over-crowding of existing facilities, and to provide needed space for the hospital and patient needs. A significant portion of the new development will be dormitory space to meet the request of the community that the University provide 925 additional beds on campus. Finally, needed support space including additional library space and athletic facilities ... are also included in the new space projections." Our own analysis shows that roughly 28% of the additional GSF (through 2050) is for dormitories, 21% is for parking structures, 25% is for Educational Support, and 26% is for Education Uses.

Since our proposed improvement to the Canal Road entrance does not increase traffic onto the campus, but merely redistributes the travel paths, the primary factors affecting vehicular trips to the University Campus are the projected number of students, staff and faculty, and the cap on parking. The projected increase in floor space has a secondary and minor impact on vehicular trips to the University campus, and is indirectly included in the background traffic assumptions which will occur with or without our proposed Canal Road improvement project.

4. The cap of 4,080 parking spaces was agreed to by the University as part of the 1990 BZA ruling (See page 17 of the BZA ruling). This takes priority over the University's original proposal reflected in their Master Plan.

Valet parking is not discussed in the BZA ruling. Its use and subsequent abolishment was discussed in conversations with the University.

- more -

The current study does not directly address the issue of parking in the Georgetown neighborhood. The limitation on trip making by the cap on parking refers only to trips to and from the University Campus itself. The focus of our study is only on the vehicles that enter and park on the Campus. Since the Proposed Build Actions do not affect the number of people who arrive by vehicle and park on local streets, these trips were not analyzed in detail as part of the traffic studies. These parkers are anticipated to occur even if there is no change in access to the University.

5. The study did not conclude that there would be no increase in "University-generated vehicular trips" through 2016. As noted in the response to the previous question, this refers only to trips to the University Campus itself. This distinction will be clarified in the Draft Environmental Impact Statement and the Traffic Technical Report.

   The traffic studies made do not assume that all University generated vehicular traffic will park on campus.

Sincerely,

for Arthur J. Hill, P.E.
Division Administrator

cc: Mr. Jim Sinnette, EFLH
Mr. Don Goffredi, DECA, BTCS, DED
Mr. Jeff Knoedler, NPS

DR. THOMAS STAUFFER
1640 35TH STREET, N.W.
WASHINGTON, D.C. 20007

October 13, 1994

C. D. Feske
Vice President
HDR Engineering
103 Oronoco Street
Alexandria, Va. 22314

Dear Sir:

We are concerned about several of the statements made to us yesterday which appear either to be inconsistent or undocumentable.

1. **You stated that GU had said to you that it could not, or would not, build new dormitories because such were tied to the financing from the power plant. Since that project was defeated, no dormitories could or would be built.**

   What was the source of that information -- when and where were you so advised, and by whom?

   Have you checked that statement against:

   a) The BZA ruling and/or the Campus Plan documents.

   Please provide us with the appropriate citations.

   b) The language of the University's latest bond issue, together with the conditions thereupon stipulated by the DC Council.

   Please provide us with the appropriate citations.

2. **You stated elsewhere that the 2.6 million square feet of proposed construction includes some 500-600,000 square feet of dormitory space. Since, you declared, such does not involve increased campus traffic, you stated that there was no need to factor the proposed dormitory space into any traffic projection.**

   a) Have you checked earlier projections from the prior Campus Plan against the actual developments?

   Please make available worksheets or memoranda showing the results of such tests.

   b) Please reconcile your statement that no dormitories will be constructed with the above statement basing the traffic analysis upon construction of 500,000 plus square feet of dormitories.

3. **Reflecting these concerns, we ask that we be given the further, additional information about your firm and its activities:**

   1. How much of your business in the last three years has been with government entities?
   2. How much of that business has been with the DOT, the FHA, or related agencies?
   3. Kindly provide a list of all EIS' prepared by your firm in the last two years, indicating the jurisdictions in which they were used.
   4. Were any of the EIS' perpared by HDR over the last 5 years used as evidence or subject to cross examination in any evidentiary hearings?

   If so, please provide a list including the service list such hearings.

We are sending a copy of this request to DOT with a request that this and all related correspondence be added to the record which is to be available for public scrutiny.

Yours sincerely

Thomas R. Stauffer

(202)
(202)

Telex: 49910
TRSTAU

OCT-13-1994 11:29 FROM STAUFFER WASHINGTON TO 7036836146 P.03/03

TOTAL P.03

HFO-DC.1

November 14, 1994

Dr. Thomas Stauffer
1640 35th Street, NW.
Washington, D.C. 20007

Dear Dr. Stauffer:

This is in response to your October 13, 1994 letter to Mr. Dave Feske of HDR Engineering. This consultant was hired to provide services to the Federal Highway Administration; we feel it appropriate to have official responses come instead through our office. I will respond to your questions in order:

1. The comment about the dormitories and power plant financing was made by Mr. Richard Pifer in a telephone conversation with Mr. Feske on August 31, 1994. It was part of a conversation to discuss linkage among elements of the Master Plan. During the conversation, Mr. Pifer indicated that there was linkage between income from the co-generation plant and the construction of the dormitories. He indicated that since the co-generation plant was not going to be built, the University was not in a position to construct the dorms at this time.

   The BZA ruling includes the following statement: "The financial ability of the University to provide these new beds is based upon tax exempt bond financing, alternate financing and the construction of the cogeneration facility." (BZA Final Order dated October 12, 1990, page 10.)

   We do not have a copy of the University's latest bond issue, and have not compared the above statement to any language contained therein.

2. We have not checked what has been built since the 1983 Campus Plan with what was proposed in that Plan. The 1990 BZA Final Order does mention facilities that had been built since the 1983 Campus Plan. (BZA Final Order dated October 12, 1990, page 4.)

- more -

The Traffic analysis assumes the potential development over the next 20 years as included in the Master Plan. The potential exists for the funding for the dormitories to become available over that period of time even if it is not available currently. Thus, the potential for their construction is included in our analysis.

3. As you are aware, we have hired HDR to help us with EIS. HDR estimates that approximately 99% of their business in the last 3 years has been with government entities. [This applies to their Virginia offices (in Alexandria and Virginia Beach) not their nationwide offices.] Approximately 60% of their business has been with DOT's, FHWA, or related transportation agencies.

   HDR(VA) has worked on 5 EIS's (or major environmental studies) in the last 2 years. These were for: New Orleans Airport EIS, NIST (Boulder CO) EIS, NIST (Gaitherburg MD) EA, West Virginia DOT Environmental Reports, and Richmond Airport Environmental Reports. In the last 5 years, no EIS's that HDR worked on, were on projects subject to lawsuits (we presume this is what you had in mind by "evidentiary hearings").

Sincerely,

Arthur J. Hill, P.E.
Division Administrator

Enclosure

cc: Mr. James Sinnette, EFLH
Mr. Tom Roth, DECA, BTCS, DKD
Mr. Jeff Knoedler, NPS

HFO-DC.1

October 18, 1994

Ms. Maria Tyler
949 25th Street, NW.
Washington, D.C. 20037

Dear Ms. Tyler:

I am sorry you missed the two informational meetings this fall on the proposed improvements to the Canal Road entrance to Georgetown University. Attached are copies of all newsletters to date as you requested. You specifically wanted to know which Congressman introduced legislation to start this project; newspaper accounts contemporaneous with the 1987 highway act (which authorized the project) mentioned Rep. Jim Oberstar as the sponsor.

Based on comments received, we will continue work on the draft environmental impact statement for the project, which we hope will be out by the end of this year. You will have the opportunity to comment on the draft EIS and at the formal Public Hearing which will be held after the draft is released.

Thank you for your interest in the project.

Sincerely,

for Arthur J. Hill, P.E.
Division administrator

Enclosures

cc: Mr. Jim Sinnette, EFLH

THE PALISADES CITIZENS' ASSOCIATION
POST OFFICE BOX 40603, PALISADES STATION, WASHINGTON, DC 20016

October 18, 1994

Gary L. Klinedinst
Division Engineer
Eastern Federal Lands Highway Division
21400 Ridgetop Circle
Sterling, VA 20166-6511

Dear Mr. Klinedinst:

On behalf of the Palisades Citizens Association, I am writing to express our association's concerns about the proposed new Canal Road Entrance to the Georgetown University campus.

We welcome your recent assurances that you will re-study the traffic impact of the proposed new intersection/interchange upon MacArthur Boulevard and Foxhall Road. We believe that the traffic impact will be far greater than estimated in your "Transportation Technical Report" of November, 1993. We would seriously challenge the assertion that the various "build alternatives" would result in "no change in operations along Foxhall Road and MacArthur Boulevard." (page 25, report of Nov. 1993)

Our concern is further reinforced by your study results. The intersection at Foxhall and Canal Roads (as well as Foxhall and MacArthur) already is a choke point in travel to downtown Washington. As acknowledged in your November study, with the additional Georgetown University traffic, delays at that intersection would likely deteriorate from "intermittent" to "extensive."

The concerns of our Association are detailed below based on our expectation of the likely impact on traffic flow, traffic congestion and our neighborhood environment.

1. MacArthur Boulevard and Foxhall Road converging at Canal Road form the principal route used by residents of the Palisades neighborhoods to drive to and from downtown Washington. During rush hours (and often throughout the day) the route already is congested with traffic. The construction of a new Canal road access to Georgetown University (particularly one with a traffic light as contemplated in Alternative 2 and which would probably be necessary with Alternative 3B) must necessarily interrupt traffic flow on the route. To what extent will this entrance impede access by Palisades residents to downtown Washington?

2. MacArthur Boulevard and Foxhall Road would become access routes for drivers seeking to enter or leave the Georgetown University campus via the new interchange. During the morning rush, traffic already is backed up on MacArthur

Boulevard and Foxhall Road, often beyond Q Street. Additional cars using the new access to Georgetown University would inevitably add to traffic congestion. The result would be increased pollution from idling cars on long stretches of MacArthur Boulevard and Foxhall Road lined by homes, apartment buildings, small businesses and schools. Have you studied and reported in an EIS (as required by the National Environmental Policy Act - NEPA) on the effect of fumes on air quality in the surrounding neighborhoods. What would be the effect of fumes on residents, pedestrians, and bikers? Can you certify the effect of these emissions on the migratory birds who take sanctuary at the Georgetown Reservoir? Will these fumes affect our water quality at the Reservoir?

3. We are fearful that the reduced access to downtown combined with increased pollution from traffic would diminish the value of housing in our neighborhood. The city can ill afford further departures of taxpayers from livable and affordable neighborhoods. While this may be difficult to forecast, can you assess the impact (perhaps from other urban commuter route constructions) on property values?

In summary, the net effect of the new access would be to shift the burden of trafffic congestion and pollution from the streets of Georgetown to the streets of the Palisades and Foxhall. Our Association questions whether there is a pressing need for the Palisades and Foxhall neighborhoods to assume such a burden created by Georgetown University.

We trust that these concerns will be addressed in the Environmental Impact Statement that you are now drafting. We would also like to state that in view of the fiscal constraints faced by our city and the nation, our Association would question the advisability of appropriating additional funds for the Georgetown access project.

We appreciate this opportunity to express our Association's views, and hope that you will keep us informed as your deliberations proceed.

Sincerely yours,

Marcia M. Allen

Marcia M. Allen
President

cc: Arthur Hill, Division Administrator
Federal Highway Administration
Eleanor Roberts Lewis, AND3D
Scott Polk, Acting President
Foxhall Community Citizens Association

JAN 26 1995

Refer to: HPC-15

Ms. Marcia M. Allen
President
The Palisades Citizens' Association
P.O. Box 40603
Palisades Station
Washington, D.C. 20016

Dear Ms. Allen:

We have received your letter dated October 18, 1994, concerning the proposed project to improve the entrance to Georgetown University from Canal Road. As you are aware, the Federal Highway Administration (FHWA) is in the process of preparing a draft Environmental Impact Statement (EIS) to analyze three alternatives to improve the entrance and the no action alternative. At this time, we would like to respond to your comments.

As requested by members of the Georgetown community, the traffic forecasts and impacts have been reviewed by the FHWA and our consultant. A higher estimated background traffic figure will be used, based on a more conservative estimate to present a worst case scenario. The Technical Transportation Report will be clarified regarding the operation of Foxhall Road and Canal Road and their intersection. While the operation of Foxhall Road outside of the intersection will not be changed, the operation of the intersection with Canal Road will decrease under a build alternative.

The peak direction travel time for existing and future conditions was estimated for the roadway segment between the intersection of Reservoir Road and Foxhall Road to the intersection of Canal Road and Key Bridge. This segment is about 1.2 miles long and was taken to represent a portion of a trip for a commuter passing through the Canal Road area to or from downtown Washington. Currently, a trip in the eastbound direction during the morning peak hour takes about 7.2 minutes. A trip in the afternoon peak hour, in the peak westbound direction, takes about 5.4 minutes.

For the no action alternative, by the year 2016, the travel times would increase by 22 seconds for eastbound traffic in the morning peak hour and by 2 seconds in the afternoon westbound peak direction. These increases are projected to occur based on the increase in the area's traffic with or without the proposed changes at the Canal Road entrance.

In 2016, for the signalized intersection alternative, travel time would increase by 94 seconds eastbound in the morning peak hour, and by 79 seconds westbound in the afternoon peak hour. This is due primarily to the delay at the proposed signalized intersection. When compared to the no action alternative, this alternative will add 72 seconds to the eastbound travel time in the morning peak hour and 77 seconds to the westbound travel time in the afternoon peak hour.

In 2016, for the two grade separated alternatives, the increase in travel time is estimated to be 50 seconds in the morning peak direction and 10 seconds in the afternoon westbound direction. This is due to the addition of weaving conflicts associated with the proposed grade separated intersection at the entrance to the University. When compared to the no action alternative, these alternatives will add 28 seconds to the eastbound travel time in the morning peak hour and 8 seconds to the westbound travel time in the afternoon peak hour.

Noise and air quality impacts are being studied and will be presented in the draft EIS. Sites have already been studied at MacArthur Boulevard, Foxhall Road, the C&O Canal Tow Path, the entrance at Canal Road, and Prospect Street. These studies will be in accordance with the National Environmental Policy Act (NEPA) and FHWA guidelines.

For this type of urban environment, property value can be affected by transportation improvements in several ways. They may decrease because of "negative spillover" effects due to decreased accessibility, noise, safety hazards, and air pollution. They may increase in value due to greater accessibility. The assessment of these changes in property value effects is highly subjective. Assumptions have to be made regarding the potential effect on property values of negative spillovers such as air and noise pollution, as well as positive opportunities created by improved accessibility. In addition, these are only several factors that may affect the property value. Other factors, such as the overall dynamics of the study area economy and its real estate market may have greater affects. Given these limitations and uncertainties for this type of project, it is not possible to objectively assess the noise and air pollution impacts on property values for any of the proposed alternatives.

Your concerns will be addressed in the upcoming draft EIS for the project in the chapter on "Comments and Coordination." If you need additional information, please contact Mr. Jim Sinnette, Environmental Planning Engineer at (703) 285-0085.

Sincerely yours,

Gary L. Klinedinst
Division Engineer

cc:
Ms. Marion Guggenheim, Chair, ANC 3D, Washington DC
Mr. Scott Polk, Acting President, Foxhall Community Citizens Association, Washington, DC

Mr. Don Goffredi, DC Department of Public Works, DECA, BTCS, DED, Washington DC w/ copy of incoming
Mr. Robert G. Stanton, Regional Director, National Capital Region, NPS, Washington D.C. w/copy of incoming
Mr. Arthur J. Hill, Division Administrator, FHWA, Washington DC
Federal Highway Administration
HPC-15:JSinnette:50085:1/24/95:X:\usr\pcshare\ken\gtwn\pallas.ltr
cc: EFLHD, Chrono, P&C, P&C Rdg, Program Specialist

Government of the District of Columbia
ADVISORY NEIGHBORHOOD COMMISSION 3-D
P.O. Box 40846
Palisades Station
Washington, D.C. 20016

October 30, 1994

Mr. Gary Klinedinst
Division Engineer Eastern Federal Lands Highway Division
21400 Ridgetop Circle
Sterling, VA 20166-6511

Re: Environmental Impact Study at Georgetown University Entrance on Canal Road, N.W.

Dear Mr. Klinedinst:

At their last monthly meeting, Advisory Neighborhood Commission 3D was briefed by representatives of Georgetown University and environmental planning engineers from your office regarding plans for the entrance to Georgetown on Canal Road, N.W. The Commissioners were briefed on the 4 proposed options; overpass, underpass, at grade intersection, or leaving the entrance as is.

ANC 3D represents citizens in the Palisades are of Nothwest Washington. McArthur Blvd. and Foxhall Road are major arteries through our neighborhood, as well as major commuter routes. The Commissioners of ANC 3D and the citizens of this area have a number of concerns regarding Georgetown's plans. Canal Road is already very congested and any type of traffic control will only further congest this major commuter route and back onto MacArthur Blvd. and Foxhall Road. Besides adversely effecting commuters from ANC 3D who use Canal Road as a major commuter route, residents from Montgomery County, MD. would be impacted as they try to make their way downtown. Fairfax County , VA. residents would also feel the squeeze as they attempt to come across Chain Bridge onto Canal Road. Rush hour on these major thoroughfares is already very slow and citizens are concerned that long term construction and ensuing traffic controls would force neighbors out of their normal "in-town" routes. Currently, traffic in and out of Georgetown is "scattered" out of a number of different exits, this modification would make Canal Road a major thoroughfare to the University. Residents of ANC 3D strongly feel that this neighborhood would be unfairly effected by these proposed changes.

The Commission and residents also question the proposed traffic figures supplied by the University during this study. It is believed that these numbers are low, and many more cars then projected will be using these roads in the next twenty years. The Commission would like to know where these traffic projection figures were generated.

In addition to the traffic congestion concerns, increased pollution from increased idling cars on McArthur Boulevard and Foxhall Road is a real concern. Many homes and schools line these roads and air quality would deteriorate in the surroundong neighborhoods.

Advisory Neighborhood Commiossion 3D asks that these concerns be addressed in the Environmental Impact Statement. Thank you for your consideration, and please keep this ANC informed as the process proceeds.

Sincerely,

Eleanor Roberts Lewis /PG
Eleanor Roberts Lewis
Chair

JAN 26 1995

Refer to: HPC-15

Ms. Marion Guggenheim
Chair
Advisory Neighborhood Commission 3-D
P.O. Box 40846
Palisades Station
Washington, D.C. 20016

Dear Ms. Guggenheim:

We have received Ms. Eleanor Roberts Lewis' letter dated October 30, 1994, concerning the proposed project to improve the entrance to Georgetown University from Canal Road. As you are aware, the Federal Highway Administration (FHWA) is in the process of preparing a draft Environmental Impact Statement (EIS) to analyze three alternatives to improve the entrance and the no action alternative. At this time, we would like to respond to your comments.

The proposed build alternatives consist of reconstructing the Canal Road entrance to the Georgetown University and subsequent closure of the Prospect Street entrance to commuter and visitor traffic to the University. The Canal Road entrance would then be the only entrance to the Main Academic Campus. A result of the proposed build actions would be to redistribute the travel patterns of drivers to and from the Main Academic Campus of the University. The impact of this redistribution on the streets on the west side of the Campus varies by hour of the day. The impacts are greatest in the morning peak hour. The benefits of the redistribution on the streets on the east side of the Campus also vary by hour of the day. These benefits are greatest in the afternoon peak hour. The draft EIS will include a detailed description and analysis of these impacts and benefits.

None of the traffic volume projections was provided by Georgetown University. The basis for the forecasts is outlined in the Technical Transportation Report, dated November 1993, and prepared by the FHWA consultant. As requested by members of the Georgetown community, these traffic forecasts have been reviewed by the FHWA and our consultant. A higher estimated background traffic figure will be used, based on a more conservative estimate, to present a worst case scenario. If necessary, revisions will be made to the Technical Transportation Report and incorporated in the draft EIS traffic analysis.

Noise and air quality impacts are being studied and will be presented in the draft EIS. Sites have already been studied at MacArthur Boulevard, Foxhall Road, the C&O Canal Tow Path, the entrance at Canal Road, and Prospect Street. These studies will be in accordance with the National Environmental Policy Act (NEPA) and FHWA guidelines.

All of your concerns will be addressed in the upcoming draft EIS for the project in the chapter on "Comments and Coordination." If you need additional information, please contact Mr. Jim Sinnette, Environmental Planning Engineer, at (703) 285-0085.

Sincerely yours,

for Gary L. Klinedinst
Division Engineer

cc:
Mr. Don Goffredi, DC Department of Public Works, DECA, BTCS, DED, Washington DC w/copy of incoming.

Mr. Robert G. Stanton, Regional Director, National Capital Region, NPS, Washington D.C. w/copy of incoming

Mr. Arthur J. Hill, Division Administrator, FHWA, Washington DC

Federal Highway Administration
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cc: EFLHD, Chrono, P&C, P&C Rdg, Program Specialist

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Executive Director

...N Street, N.W.
...ington, DC 20007
...: 202-
...: 202

October 30, 1994

Mr. Arthur Hill
Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street, NE
Washington, DC 20002

Re: Georgetown University Canal Road Entry Project

Dear Mr. Hill:

The following questions have arisen from various sources as a result of meetings and review of the EIS Transportation Technical Report (Nov. 1993) prepared by HDR Engineering, Inc. for the Federal Highway Administration. While not definitive they will be helpful in addressing some of the aspects concerning the various alternatives for the Canal Road Entry Project. Some of the questions (and answers) will inevitably overlap, some no doubt have been asked by others and some require further information from Georgetown University. Whatever the case, we trust that all the questions will be addressed in your response.

The basic intent of these questions is to clarify aspects of the analysis and recommendations contained in the report so that we can all better understand the project.

A. GENERAL

1. How does this project differ from the similar project proposed in 1982-83. What was the final result of that review process? Have criteria used for evaluation (environmental, traffic, etc) changed significantly? How do the traffic patterns and loads anticipated/projected by FHA in 1983 compare with today's actual figures?

2. Please confirm the total amount of additional square footage the University and Medical Center plan to build, the types and numbers of occupants as well as the traffic (parking and trips) the FHA expects will be generated.

3. Are the traffic patterns and loads generated by the Medical Center pertinent or relevant to this project? Would it be appropriate and helpful to consider all of the traffic generated by Georgetown University on all of the streets in the neighborhood? If such an enlargement of the study/report were found to be appropriate, could it be done with the existing funding or would more funding be necessary?

4. Will the Canal Road entrance be used by the Medical Center? The Technical Report precludes this option. What would be the effect of allowing free or limited interchange of traffic between the Medical Center and the University (i.e. allowing Campus traffic to exit onto Reservoir Road and Medical Center to enter and/or leave via Canal Road)?

   The 1989 GU Bicentennial Master Facilities Plan (Draft No.2, Dec. 29, 1989 - Map No. 13 "Future Vehicular and Services Circulation with Parking") designates Reservoir Road entrances No. 1 and 4 as well as the New South Entrance as "Primary entry".

Additionally it shows these three entrances connected by a "primary vehicular route." This would presumably allow for movement inquired about above. Is this future design still anticipated and if so how has it been incorporated into the future projections of traffic patterns and loads on the respective entries and adjacent roadways? Members of the committee have heard from community representatives (Georgetown and beyond) that this may result in preferable traffic patterns and loads for all concerned. The University has indicated it would be open to testing this option.

5. Would it be possible for the FHA to make the information in its files available for review by the general public? To further the exchange of information we would like to establish a complete set of files on the project at the Georgetown Public Library, Peabody Room, making then readily accessible to the community. Would you provide a full set of correspondence between FHA and community or university representatives as well as data and information provided to those representatives?

6. Is a new parking garage being planned? If so where and when will it be built, how many vehicles will it serve and what surface parking will it replace?

7. What are the current plans for the project to rehabilitate the ends of the Whitehurst Freeway that was included in the Transportation Improvement Plan for 1993-98? Are funds included in current appropriations? Are matching dollars identified? How would this project impact upon the Canal Road alternatives under consideration?

8. The last paragraph on Page 3 of the Transportation Technical Report is not clear. Could you please expand on this and relate it to specific evaluations or results contained in the report? ("This analysis was based on ...")

9. Are there matters pending before other regulatory bodies (Zoning, Commission of Fine Arts, EPA, etc.) that could affect or have an impact on this project? If so what are the ramifications of each?

B. DATA COLLECTION

1. In addressing the following questions, please state the age, reliability, level of accuracy and/or margin for error, etc. of the relevant data.

2. What data was collected independently by the FHA, what data was abstracted from either the Campus Master Plan or the BZA ruling on that Plan and what data was abstracted from the D.C. Council of Governments studies? Respectively, when was the data collected and for how many years is it reliable?

3. What is the relative importance of the above three (FHA, GU/BZA and COG) categories of information. What weight was each given in the preparation of the Transportation Technical Report?

4. The arrival/departure study cited in the draft EIS appears to be based on information supplied on 375 information cards returned from some 1,100 cards distributed at the Prospect Street entrance. How reliable are conclusions drawn from such a sample? Is there a way to secure more comprehensive information from all the vehicle operators entering and leaving the campus?

5. What are traffic counts for Prospect Street on Figure 15 (PM peak hour)?

6. More information is necessary on O/D patterns and traffic count for traffic travelling east (inc. northeast and southeast) of the University in both present and future

conditions. Specifically it has been suggested that there would be a substantial increase in PM peak hour loads of vehicles travelling north on 33rd Street.

C. PARKING

1. According to the Technical Report, the current BZA-mandated maximum number of parking spaces is set at 4,080. The combined total is presently at 3,608, with the University occupying 40% and the Medical Center 60%.

2. Where will the remaining 472 allowable spaces be located and which entrance will serve them?

3. Would it be advisable to increase the BZA maximum number of allowable parking spaces to accommodate undergraduates now parking off-campus? Has the University studied the impact of such a change?

4. Is car pooling encouraged? How does the car/employee ratio for the University (and Medical Center) compare to other large businesses in D.C? Has the University used to the fullest extent possible satellite parking lots, distance learning, electronic networking and other methodologies researched by the Department of Transportation. How does its utilization compare with that of the private sector?

5. Could G.U. make parking available to the general public at night and on weekends in conjunction with the proposed overall Georgetown parking plan (could use GUTS shuttle service). Would the shuttle bus service be able to support such parking?

6. Why are undergraduates not allowed to park on campus? Has the University considered allowing this? What were its findings?

   Would it make sense to have more vigilance to monitor students parking illegally using temporary permits? Would it be appropriate for the University to design and implement an independent parking enforcement service (in conjunction with DC DPW) to address this problem? Has the University considered any methods of reducing illegal parking by students or employees on area residential streets?

D. TRAFFIC PATTERNS AND LOADS

1. What are the various levels of closure possible for the Prospect Street entrance? How are emergency and service vehicles defined? Is there any possibility that the entrance would in fact not be closed? Is so, under what conditions and with what results?

2. Concerns have been raised about the consequences of closing the Prospect Street entrance and forcing anyone commuting to or from the areas north and east of the University to arrive and leave by way of the Canal Road entrance, thus adding to the Key Bridge traffic at each rush hour.

   Other than the reference in the Draft EIS to the fact that District residents will "have to drive further to the Canal Road entrance through a somewhat circuitous route" has this changed traffic burden been studied? If so what were the conclusions?

3. What is to be the status of the O Street entrance?

4. How much additional congestion is anticipated at Key Bridge/Canal Road/M Street in the Build Alternatives and how will this affect the performance of that intersection?

5. Page 4 of the Technical Report refers to Foxhall Road as a 4-lane arterial. This is only true south of Whitehaven Street. Does this impact any of the calculations or results stated in the report - specifically the additional cars (Build Alternatives) referred to in Figure 14 (AM Peak-Hour)?

6. Will signalization be adequately coordinated at Canal Road intersections with Key Bridge, Whitehurst, Foxhall, and MacArthur intersections? Will it be able to minimize the congestion anticipated by any of the Build Alternatives with intersections further east and west? Is this coordination able to be accurately predicted and carried out? Is D.C.'s traffic control system able sustain the performance levels indicated through the next two decades?

7. Would there be any traffic pattern change to the north side (Reservoir Road) of the campus other than the approximate net no-change referred to on page 21, para. 1?

8. With respect to new traffic patterns east of the University occurring with any of the build alternatives, has the FHA reviewed the effect of a full time (all day) or limited (evening rush hour only) left movement of traffic headed eastbound on Canal Road/M Street turning left on Wisconsin?

   DC DPW seems to have precluded this option at other times but perhaps it should be reviewed again in light of the increased eastbound traffic movement. Was any consideration given to any change in eastbound traffic turning left at the intersection of M and 33rd Street, particularly commercial traffic?

9. Was an alternative considered that included an at-grade intersection with left turn from the University to Canal Road but with no left turn from Canal Road into the University?

10. What other interim measures or limited traffic movements could be considered as a final alternative, phase-in process or on a short-term trial basis so that the traffic burden could be distributed more evenly among the surrounding neighborhoods?

E. COSTS

1. What would be the estimated cost of the three alternatives under consideration? Which of the proposals has the best value (i.e. cost vs. performance)?

2. How much of the Federal funding has already been appropriated? For what purposes was it allocated (analysis and/or construction)? How much has been spent? How much more has been earmarked?

3. What matching funds would apply? How much will D.C. pay? Is this a typical U.S./D.C. 90/10 or 85/15 split?

4. Are there any other financial contributors to the project? How much matching funds have been committed or expended and from what sources?

5. Who maintains the roadway now and who will maintain it in the future? What use and zoning restrictions would apply?

The Citizens Association of Georgetown has not taken a position on the current (1993) version of this project at this time and needs to understand better the ramifications of the various alternatives before doing so. While our mission is to preserve the historic quality of Georgetown and in general to promote the interests of Georgetown residents, especially in this case the reduction of traffic congestion in our narrow streets, we are also concerned

about the impact of any changes beneficial to Georgetown which might adversely impact on our neighbors to the west and north.

On behalf of Stephen Kurzman, the current President of CAG, and the members of the CAG Traffic and Parking Committee, I would like to thank you for addressing these questions. We are certainly grateful for the FHA's objective role in the review of this project.

At the recent quarterly meeting between Georgetown University and community groups it was suggested that it would be helpful to convene a meeting to address the above questions on the project. ANC commissioners, representatives (three maximum?) from each civic association and Georgetown University will be invited to participate in an on-the-record session with representatives from the FHA. We will consult with other civic groups to convene such a meeting in the next three weeks.

I have spoken with Mr. James Sinette, FHA, about this and he said it would be best if the meeting could be scheduled after November 14. He indicated that between Nov. 7 and Nov. 14 the FHA and its consultants would be focusing on trying to address the questions they have received to date. It would be helpful if you could send us and all the interested parties the responses as soon after your Nov. 14 deadline as possible so that we can have a chance to review them before the meeting.

Accordingly we will try to schedule a meeting on Monday or Tuesday, November 21 or 22, assuming the answers can be made available to us by November 16 or 17.

If further study and review of the project (see questions above) is warranted, we assume that the due-date for the draft EIS will be moved back accordingly to provide adequate time for the additional review. I can be reached at 202-337-4826 if you have any questions or comments. I have taken the liberty of sending a copy of this letter directly to Mr. Sinnette.

We look forward to your earliest reply.

Sincerely,

Outerbridge Horsey

Outerbridge Horsey, AIA
Chairman, CAG Traffic and Parking Committee

cc: Oscar Turner, Chair, ANC-2E
David Jory, Chair, ANC-3B
Rossalyn Doggett, Chair, ANC-3C
Eleanor Roberts Lewis, Chair, ANC-3D
Peter Pulsifier, Burleith Citizen's Association
Scott Polk, Foxhall Citizens Association
Steve Hopkins, Cloisters of Georgetown Association
Max Sporer, Cloisters West Homeowners Association
Tom Silverstein, Georgetown Reservoir Neighborhood Association
Jack Everett, Glover Park Citizens Association
Marcia Allen, Palisades Citizens Association
Michael Kelly, Georgetown University
Linda Greenan, Georgetown University
Stephen Kurzman, Citizens Association of Georgetown
CAG committee members

HFO-DC.1

November 4, 1994

Mr. Outerbridge Horsey
Chairman, The Citizens Association of Georgetown
Traffic and Parking Committee
3222 N Street, N.W.
Washington, D.C. 20007

Dear Mr. Horsey:

Thank you for your letter dated October 30, 1994 concerning the Georgetown University Canal Road Entrance Project. As you have discussed with Mr. Jim Sinnette of the Eastern Federal Lands Highway Division office of the Federal Highway Administration, we are planning to meet with our consultant soon to discuss all of the public and agency comments and questions received to date. We have forwarded a copy of your letter to our consultant to include in this discussion.

Based on the comprehensive nature of your questions, we will not be able to provide you with a response prior to your tentative meeting date of November 21, 22. We will not meet to go over our response until that same week.

We realize that this will delay your meeting, however, we believe that the additional time used to answer your letter will result in a more complete response that will better clarify the issues that your letter raises.

We appreciate the time you have taken to thoroughly review the proposed project. If you have any questions, please contact Mr. Gerald Yakowenko at 202-523-0169.

Sincerely

for Arthur J. Hill, P.E.
Division Administrator

✓ cc: Mr. Gary L. Klinedinst, Division Engineer, FHWA-EFLHD

THE CITIZENS ASSOCIATION OF GEORGETOWN

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STAFF
Rochelle Richard Reid
Executive Director

3222 N Street, N.W.
Washington, DC 20007
TEL: 202-
FAX: 202

November 8, 1994

Mr. Arthur Hill
Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street, NE
Washington, DC 20002

By fax: 202-523-0181

Re: Georgetown University Canal Road Entry Project

Dear Mr. Hill:

Thank you for your letter of November 4, 1994 concerning the list of questions submitted to your office by CAG.

We appreciate the attention the FHWA intends to give to the questions and fully understand the need for additional time. However, we would like to request a firm date by which we will receive your response so that we can proceed with the necessary arrangements (meeting place reservation, notification etc.).

In speaking with Mr. Yakowenko, we agreed that your issuance of a written response on or before November 30, 1994 would give us time to circulate it in preparation for a meeting on Tuesday, December 6 or Wednesday, December 7, 1994.

Your earliest confirmation of this date (Fax 202-337-0658) would be greatly appreciated.

Sincerely,

Outerbridge Horsey, AIA
Chairman, CAG Traffic and Parking Committee

cc: Stephen Kurzman

HFO-DC.1

November 9, 1994

Mr. Outerbridge Horsey
Chairman, The Citizens Association
of Georgetown
Traffic and Parking Committee
3222 N Street, N.W.
Washington, D.C. 20007

Dear Mr. Horsey:

Thank you for your letter dated November 8, 1994, concerning the Georgetown University Canal Road Entrance Project. As you have discussed with Mr. Jim Sinnette of the Eastern Federal Lands Highway Division office of the Federal Highway Administration, and Mr. Jerry Yakowenko of this office, we intend to respond to questions raised in your October 30, 1994 letter, by the close of business on Wednesday November 23, 1994.

We trust that this will allow you sufficient time to circulate our response among your Association members prior to a meeting during the first week of December. We appreciate the time and interest your Association has shown for this project. If you have any questions, please contact Mr. Gerald Yakowenko at 202-523-0169.

Sincerely

for Arthur J. Hill, P.E.
Division Administrator

cc: Mr. Gary L. Klinedinst, Division Engineer, FHWA-EFLHD
Mr. Maurice Keys, DC DPW - OPP, Transportation Systems

U.S. Department of Transportation

Federal Highway Administration

Region 3
District of Columbia Division

Union Center Plaza, Suite 750
820 First Street, N.E.
Washington, D.C. 20002

IN REPLY REFER TO:

HFO-DC

November 30, 1994

Mr. Outerbridge Horsey
Chairman, The Citizens Association
of Georgetown
Traffic and Parking Committee
3222 N Street, N.W.
Washington, D.C. 20007

Dear Mr. Horsey:

Following are responses to the questions raised in your letter dated October 30, 1994. These were in response to the traffic analysis prepared for the proposed changes to the Canal Road entrance to Georgetown University. This analysis is part of the studies being prepared as backup for the Draft Environmental Impact Statement (DEIS). The questions from the Citizens Association of Georgetown are shown in *italics* , and our responses are shown in regular text. Since some of the questions were addressed to University operations and policies, the University was contacted to provide input to the responses. Their responses are indicated in **bold.**

In reviewing the responses, it is important to keep in mind the scope and purpose of the DEIS and the environmental process. The purpose of the DEIS is to identify and evaluate the relative impacts associated with the proposed action to reconstruct the Canal Road entrance to provide for all movements in and out of the University. The DEIS is not intended to be an action plan to correct transportation capacity limitations in the Georgetown neighborhood. We are also not attempting to revisit zoning decisions concerning development of Georgetown University reached in 1990. Also, the Federal Highway Administration (FHWA) is not in the position to direct the University to implement any changes in the access to, or changes to the operation of roads within the University property, or to direct the D.C. government to take certain actions on the rest of the transportation system.

A. GENERAL

1. *How does this project differ from the similar project proposed in 1982-83. What was the final result of that review process? Have criteria used for evaluation (environmental, traffic, etc) changed significantly? How do the traffic patterns and loads anticipated/projected by FHWA in 1983 compare with today's actual figures?*

The current project is different from the 1982-83 study in several areas. First, it is studying more alternatives. In the previous study only an at-grade intersection was evaluated. The current study is also looking at two grade-separated alternatives. Second, in the previous study, both the O Street and Prospect Street entrances were assumed to remain open. Since then, the O Street entrance has been closed. And as part of the current study, it is anticipated that the Prospect Street entrance would be closed if the Canal Road entrance is expanded.

The final result of the 1983 review process was a Finding of No Significant Impact (FONSI) by the Urban Mass Transit Administration on October 26, 1992. This was based on an earlier Draft Environmental Assessment (EA) and 4(f) Statement. The FONSI said, "Based on the attached Environmental Assessment, it is the Urban Mass Transportation Administration's finding that there are no significant impacts on the environment associated with the development and operation of this project." However, the project did not proceed beyond this point into final design, or construction.

The evaluation criteria used in the current study have been expanded from those used in the 1983 study. The principle criteria used previously included traffic, noise, air, and historic resources. These criteria are being used in the current evaluation in preparation of the DEIS. In addition, however, the FHWA is also looking at potential impacts in approximately 20 categories in preparing the DEIS. Also, the evaluations for the DEIS are in greater detail than required in a EA. For example, in the 1982 EA no assessment was made of the historic resources in either direction along Canal Road. Also, the traffic analysis was less detailed.

Because of the difference in assumptions relative to the O Street and Prospect Street entrances being open or closed, the traffic patterns and loads between the two studies are not comparable. Also, the 1982 EA only looked at the traffic in 1982 and did not make any projections for future years.

- more -

2. *Please confirm the total amount of additional square footage the University and Medical Center plan to build, the types and number of occupants as well as the traffic (parking and trips) the FHWA expects will be generated.*

The Georgetown University Bicentennial Master Plan dated 1 June, 1990 proposed to add, by the year 2010, 2.9 million gross square feet (GSF) to the Academic Campus and about 0.9 million GSF to the Medical Campus. This amounts to about 3.8 million GSF [Note: Some figures in that document are internally inconsistent, so these figures are our best estimate.]. Based on the Board of Zoning Adjustment (BZA) analysis process, the proposed square footage was also shown adjusted to Applicable Zoning Area (AZA). This decreases the GSF by the areas not counted in the zoning calculations(roughly, those floors below ground level adjacent to each building).

The BZA ruling in November 1990 approved the addition of 2.6 million square feet (AZA). This BZA ruling approved the square footage according to the following seven functional categories of land use. These categories had initially been listed in the 1983 plan and were used as the basis for the 1989 plan.

Educational	ED	classrooms, administrative, and faculty offices
Educational Mixed use	EDMU	residential, educational and decentralized recreation
Educational Support	ES	parking, utility plant, and miscellaneous auxiliary uses
Medical	M	Hospital, clinic, staff, etc.
Medical Support	MS	parking and miscellaneous uses
Recreational	REC	recreational
Residential	RES	residential
Commercial	C	commercial

As noted on page 9 of the BZA ruling," the bulk of the projected growth in building space results in the need to replace obsolete facilities, to relieve over-crowding of existing facilities, and to provide needed space for the hospital and patient needs.

A significant portion of the new development will be dormitory space to meet the request of the community that the University provide 925 additional beds on campus. Finally, needed support space including additional library space and athletic facilities...are also included in the new space projections."

Also in the BZA ruling on page 9, the total faculty and staff is projected to increase from 6,800 in 1989 to 7,500 through 2010 and an additional 500 visitors are projected to come to the Campus. Also, an additional 925 students are projected to live on the Main Academic Campus. The ruling also set a cap on the increase in student enrollment of 340 Full Time Equivalent undergraduate students. The BZA requires enrollment to be calculated in terms of Full Time Equivalents (FTE). This relates the course load of part-time students to the normal full-time course load of the individual students of the University. Thus, there are more <u>total</u> students taking courses than FTE students.

The BZA ruling also put a cap on the number of parking spaces on the University to 4,080 (see page 36.) This cap is intended to limit the number of <u>vehicular trips to the Academic and Medical Campuses</u>. This cap was originally shown in the 1983 Comprehensive Plan. While this cap may limit the number of vehicle trips into the Campus, there may be additional taxi trips to the University or auto trips by drivers who park on Georgetown streets. As part of the overall traffic analysis, "background" traffic was projected to increase. This increase is intended to provide, in general, for growth due to additional non-University development, changes in travel patterns, general growth in vehicular trip-making etc. Thus while this growth in "background traffic" does not specifically enumerate the increase in University-related traffic, it does provide a method to address this situation.

We generally used the development order of magnitude as envisioned by GU for 2010, or as specially approved by BZA, through 2000, as our best estimate of conditions over the traffic analysis period (1996-2016) of the project, rather than the projected 2050 build out.

3. *Are the traffic patterns and loads generated by the Medical Center pertinent or relevant to this project? Would it be appropriate and helpful to consider all of the traffic generated by Georgetown University on all of the streets in the neighborhood? If such an enlargement of the study/report were found to be appropriate, could it be done with the existing funding or would more funding be necessary?*

As noted in the introduction, the purpose of the DEIS is to evaluate the impacts associated with the changes at the Canal Road entrance.

Currently, the access between the Medical Center and the Academic Campus is restricted to those with keycards. With this restriction, the traffic at the Medical Center is not considered pertinent to the analysis of access to the Academic Campus resulting from changes to the Canal Road entrance and the anticipated closing of the Prospect Street entrance.

The focus of this study is on the vehicles that enter and park on the University's Main Academic Campus. Since the Proposed Action does not affect the number of people who arrive by vehicle and park on local Georgetown streets, these trips were not analyzed as part of the DEIS. These parkers are anticipated to occur even if there is no change in the access to the University.

However, the total traffic on local streets is relevant to the evaluation of overall operations and traffic volumes on the local streets. Thus as noted in the previous response, this traffic is addressed by the growth of "background" traffic on local streets which includes traffic to the Medical Center. This growth in background traffic also includes not only vehicles bringing people to either the Medical Campus or the Academic Campus but also vehicles parked on Georgetown streets. It should noted that GUTS usage has increased over the last decade, indicating this is the most reasonable option for people considering the cap on campus parking and the lack of on street parking.

We do not consider expansion of our study necessary.

4. *Will the Canal Road entrance be used by the Medical Center? The Technical Report precludes this option. What would be the effect of allowing free or limited interchange of traffic between the Medical Center and the University (i.e. allowing Campus traffic to exit onto Reservoir Road and Medical Center to enter and /or leave via Canal Road)?*

   The GU Bicentennial master Facilities Plan (Draft No. 2, Dec 29, 1989 - Map No. 13 "Future Vehicular and Services Circulation with Parking") designates Reservoir Road entrances No. 1 and 4 as well as the New South Entrance as "Primary entry".

   Additionally it shows these three entrances connected by a "primary vehicular route". This would presumably allow for movements inquired about above. Is this future design still anticipated and if so how has it been incorporated into the future projections of traffic patterns and loads on the respective entries and adjacent roadways? Members of the committee have heard from community representatives

(Georgetown and beyond) that this may result in preferable traffic patterns and loads for all concerned. The University has indicated it would be open to testing this option.

It is up to Georgetown to indicate their willingness to test and implement this option before any analysis could be completed of the possible traffic patterns and loadings. It would also require coordination between the University and the BZA. Following are the initial responses of the University to these questions.

Canal Road Usage-- As part of the authorization of the Leavey Center garage (Podium A), the Campus Plan and BZA Orders authorizing construction required the installation of a transportation management system which would prohibit free-flow traffic and maintain the balance of traffic flow as it existed at the time of construction. A keycard system was installed to maintain the balance of traffic as it existed at the time of construction. The University is precluded by BZA order from permitting free flow traffic between the north and south sides of campus. The flow traffic is controlled with gate arms located on the east and west sides of the Leavey building. The gate arms are monitored with TV cameras and controlled remotely. Approximately 600 parkers have key cards which permit them to pass through the control gates. New parkers assigned parking which would require them to pass though a control gate are issued key cards.

Patients are not now and would not be allowed to access the Medical Center from the South Entrance. To the extent that faculty and staff currently use the Prospect Street and Canal Road entrances: i.e. those who live in Virginia or Southern Maryland: and access Medical Center parking in the Leavey Center by using the keycard access system, these people would continue to access Medical Center parking areas by using the South Entrance.

Free exchange--The University believes that the impact of allowing free and unrestricted movement of University employee traffic would be minimal. However, this cannot be validated until the South Entrance is constructed.

Primary Road--The future plan of the road network with primary entrances designated at the South Entrance and Entrances One and Four, along Reservoir Road, is still envisioned. Currently, and as mentioned above, the University is precluded from permitting free flow traffic. However, with BZA concurrence and at the request of the community, the University is willing to test this option.

5. *Would it be possible for the FHWA to make the information in its files available for review by the general public? To further the exchange of information we would like to establish as complete set of files on the project at the Georgetown Public Library, Peabody Room, making them readily accessible to the community. Would you provide a full set of correspondence between FHWA an community or university representatives as well as data and information provided by those representatives/*

The information in the FHWA files is available for review based on formal written request for the documents subject to normal Freedom of Information Act limitations. We are willing to provide select resource information, backup reports, and the DEIS at the Library. The DEIS and the FEIS will contain listings of the various community and agency comments and the written responses (including letters such as this one.)

6. *Is a new parking garage being planned? If so where and when will it be built, how many vehicles will it serve and what surface parking will it replace?*

Parking garages are shown in the 1989 Bicentennial Plan included in several multi-level structures stepping down the slope of the University; these structures are referred to as "podium". These parking spaces are as follows--

Podium B	300
Podium E	675
Parking Garage III	1,300
Total	2,275

The University confirmed that a new parking garage is planned as the foundation of Podium B (current location of the baseball field). The new garage is projected to hold approximately 1,000 cars and replace the existing surface parking area of Lot 3. They also noted that the Campus Plan highlights the area currently used as the baseball field as the future location of the new garage (directly south of the existing Leavey Center). The estimated start date of the construction is at least several years away and is dependent upon the identification of a funding source.

7. *What are current plans for the project to rehabilitate the ends of the Whitehurst Freeway that was included in the Transportation Improvement Plan for 1993-98? Are funds included in current appropriation? Are matching dollars identified? How would this impact upon the Canal Road alternatives under consideration?*

Final design plans for the completion of the ends of Whitehurst Freeway are going through their last review now. with luck, it will be advertised by the end of the year. Federal funds were obligated for this project in September 1991. You should ask D.C. the status of their matching funds - as you are aware, the D.C. government is undergoing a cash flow crunch, so they have been delaying the start of many previously authorized construction projects.

If it is possible to provide a third eastbound Canal Road approach lane at the Whitehurst Freeway intersection, this would provide for more efficient flow of vehicles travelling eastbound through this intersection. At present, the through traffic is restricted to the inner lane while the outer lane is only for vehicles turning right onto the Whitehurst Freeway. Two through lanes would reduce the queuing and congestion at this intersection in the morning peak hour. This would not help the afternoon peak hour. However, it is unclear if there is enough space to accommodate a third lane, and the DC government would have to agree to this modification.

8. *Last paragraph on Page 3 of the Transportation Technical Report is not clear--please expand on this and relate it to specific evaluations or results contained in the report? (This analysis was based on...?)*

This relates to such analysis of factors such as the queuing and Level of Service (LOS). For example, the intersection at Canal Road/Whitehurst Freeway operates currently at LOS "F". This means that the intersection is accommodating more vehicles than its calculated capacity. Thus there is congestion and major queuing at the intersection during both peak periods. The specific qualitative methodologies, therefore, can not measure the changes that would potentially occur with the alternatives and/or changes in the future. With any increase in traffic, the Level of Service will still be LOS "F". In this case, travel time comparisons were developed to provide a measure of operation.

9. *Are there matters pending before other regulatory bodies (Zoning, Commission of Fine Arts, EPA, etc.) that could affect or have an impact on this project? If so what are the ramifications of each.*

We are not aware of any of other third party issues, developments, or other matters which would affect or impact the proposed project. No major development projects are proposed for the area that would affect background factors or which would change the traffic growth projections.

In addition, as part of the overall environmental process dictated by the National Environmental Policy Act of 1969, various federal and local agencies were contacted at the initial as well as later phases of the study to identify issues and areas of concern. During these meetings, they normally would take the opportunity to notify the FHWA of potential actions that could affect the project.

These same agencies will review the DEIS and make formal comments. These include such agencies as the Environmental Protection Administration (EPA), the National Capitol Planning Commission (NCPC), and the State Historic Preservation Officer (SHPO) for the District. These comments must be addressed in the Final EIS (FEIS). In addition, any comments from the public at the Public Hearing must be addressed in the FEIS. These are part of the factors that the FHWA takes into account in making a decision on an alternative. The ramification of the comments on the final alternative selected would likely depend on the alternative selected.

For example, the comments from the NCPC would have more impact on the two interchange alternatives as compared to the No Action and the at-grade intersection alternatives. Also, with regard to historic resources, the SHPO will be contacted to determine the degree of impact and possible mitigation to any historic resources for all alternatives being considered. Thus, the comments from the SHPO would only have ramifications if an alternative having an effect on historic resources were selected.

B. DATA COLLECTION

1. *In addressing the following questions, please state the age, reliability, level of accuracy and/or margin of error etc. for the relevant data.*

In transportation planning, the data used, the analysis and methodology techniques employed, and the forecasts prepared are principally evaluated using a "reasonability check". This results from the number of different factors involved in the process, the variations in data and trends, the difference in the sources of data, and the limited amount of follow analysis. Within this framework, the concepts of level of accuracy and margin of error are not used. Rather, the test is whether the results "appear reasonable" compared to results in studies with similar conditions, inputs, and forecasts. In addition, the results can be reviewed to assess the "sensitivity" of the results to changes in any of the input factors.

2. *What data was collected independently by FHWA, what data was abstracted from either the Campus Master Plan or the BZA ruling on the Plan and what data was abstracted from the DC Council of Governments studies? Respectively, when was the data collected and for how many years is it reliable?*

Data was collected for several main areas--projected development at Georgetown University, current and related trip making, and traffic volumes on streets in the vicinity of the University.

Development - All information on projected development was obtained from the Campus Master Plans and the BZA ruling on November 1990. Both the 1983 and the 1989 Campus Master Plans were used in determining the projected total development at the University. The 1989 Campus Master Plan included projected development through 2010 and onto 2050. The BZA ruling included approval of three items that were used in the planning process. These were an approval on the amount and type of floor space, a cap on the number of parking spaces at 4,080 spaces, and a cap on the increase in enrollment of 340 Full Time Equivalents (FTE). The approval still requires that the University to go before the BZA to get approval for each building they construct on the campus.

The BZA ruling is the key element and the basis for the forecasts of trip making at the University. This ruling sets a strong legal framework for development at the University. Any changes in the Campus Plan would have to be approved by the BZA. Each building has to be shown to be consistent with the BZA ruling before it can be approved. The BZA ruling only approved the Campus Plan through the year 2000. Besides approval of the total square footage, the BZA ruling only approved the floor space according to seven types of development space. (These are listed in response to A. GENERAL, Question 2.) According to discussion with DC planning staff, this limits the type of space to these uses. These aspects of the BZA ruling are considered to make it a reliable, reasonable basis for future planning of trip making at the University.

Trip and Travel Data - Data on trip making and travel volumes was obtained from several sources. Previous studies of traffic conducted by the University in 1982 and 1989 were used to obtain historical information on the vehicular travel in and out of the University. These reports also contained information on parking. Information was also obtained from the 1982 Environmental Assessment.

Specific information on current travel to and from the University was obtained in January 1993. This included an Origin and Destination Study, traffic counts of vehicles in and out of the Academic Campus, and traffic counts on some streets in the area. We also used the information and analysis developed by Dr. Everett Carter in his study of the proposed entrance road project for ANC 3B dated 30 June 1991. Data was also obtained from the University on the usage of the Georgetown University Transit Service (GUTS) buses over the last several years.

Background traffic data was also obtained from the DC Department of Public Works (DCDPW) from some traffic counter locations in the area. This provided data on the growth of traffic on Canal Road by direction and peak hour for different months over the last several years. DCDPW also provided traffic flow maps for the entire District streets for 1991 and again for 1993.

The historical data from the different sources was compared and evaluated. Actual volumes and figures as well as trends were found to be valid and reliable. These were used to develop forecasts for the area. These are considered to be reliable for the time span of the study for a couple of reasons. First, no major land developments are projected for the area. The area is developed and the projected background changes are anticipated to have only minor to modest impact on traffic in the Georgetown area. Second, trends in growth of traffic volumes on some streets in the area have shown a leveling off over the last several years. Third, no roadway projects which would add major roadway capacity are planned for the area.

3. *What is relative importance of these three (FHWA, GU/BZA and COG) categories of information. What weight was given to each in preparation of Transportation Technical Report?*

The importance of each set of data varies according to its use for the DEIS. The purpose of the DEIS is to measure the impacts of the Proposed Action--the improvement of the Canal Road entrance and the anticipated closure of the Prospect Street entrance. Again, as noted in the introduction, the DEIS is not intended to be a study of the traffic impacts of the University and its potential development on the Georgetown streets. Thus some aspects of University traffic that would not be affected by the Proposed Action are not considered pertinent to this study and are not quantified.

With regard to development, the BZA ruling was the basis for all future traffic forecasts. Its critical elements were the designation of the floor space--total and by category--, the limit on the number of FTE students, and the limit on the number of parking spaces on the University.

With regard to traffic and trip making, the primary information obtained as part of the FHWA field surveys and data collection was the basis for evaluation and analysis of current and future conditions. It also was the basis for the determination of the impacts associated with the changes in the access to the Main Academic Campus. The conclusions of these analyses were considered further substantiated since they were in agreement with those found by Dr. Carter in his report for ANC 3B.

4. *The arrival/departure study cited in the draft EIS appears to be based on information supplied on 375 information cards returned from some 1,100 cards distributed at the Prospect Street entrance. How reliable are conclusions drawn from such a sample? Is there a way to secure more comprehensive information from all the vehicle operators entering and leaving the campus?*

Based on the traffic counts taken at the same time as the Origin & Destination (O&D) Study, between 3,300-3,400 vehicles enter the Main Academic Campus on a typical day. The origin-destination cards were handed out to drivers entering both the Canal Road and Prospect Street entrances. The 1,100 cards represent about one-third of the entering drivers. The 375 response cards used in the study represent over one-third of all the cards handed out. This response is considered a statistically adequate response rate and the resulting data within the acceptable range for traffic studies. The *Manual of Uniform Traffic Studies*, published by the Institute of Traffic Engineers states that 25-30% response rate is adequate. Thus, the results are considered reliable for determining the existing travel routes to and from the Main Academic Campus. In addition, the resulting routes are consistent with the travel patterns projected by Dr. Carter based on the location of owners of parking permits at the University.

As noted, the results of the survey are considered statistically adequate for planning purposes. Other methods to gather information could have included having interviewers collect the information from people directly at the entrances; or, a complete survey of all faculty and staff, students, and visitors to the University could be undertaken to obtain information on the mode of travel--the so called "modal split"--of all trip makers to the University. However, this is the type of information that would be necessary if a complete impact transportation needs study were being completed. This information is not considered relevant for the type of analysis to be completed for the DEIS. This analysis focuses on the change in vehicular patterns associated with the Proposed

Action. For this analysis, the information obtained from the O&D Survey is considered adequate and sufficient for currently accepted engineering analysis.

5. *What are counts for Prospect Street on Figure 15 (PM peak hour)?*

In - 150 and Out - 315 for a total of 465 vehicles or 10.7% of the daily total.

6. *More information is necessary on O/D patterns and traffic count for traffic traveling east (incl. northeast and southeast) of the University both present and future conditions. Specifically it has been suggested there would be a substantial increase in PM peak hour loads of vehicles travelling north on 33rd Street NB.*

The vehicle trips affects are those to the northeast using Wisconsin Avenue or local streets. During the PM peak hour about 450 vehicles exit the Main Academic Campus; 12% (56 auto) of these use Wisconsin Avenue or local streets to the northeast. With the closing of the Prospect Street entrance and the redistribution of traffic, it is estimated that 9.8% of the vehicles existing in the PM peak hours from the Canal Road entrance would use Wisconsin Avenue or local streets. This amounts to about 44 vehicles. It is projected that half of these would turn west and half would turn east from the entrance. Thus, about 22 vehicles would potentially be turning north on 33rd Street. However, some of these could continue east on M Street and use other routes to travel north.

C. **PARKING**

1. *According to the Technical Report, the current BZA-mandated maximum number of parking spaces is set at 4,080. The combined total is presently at 3,608, with the University occupying 40% and the Medical Center 60%.*

2. *Where will the remaining 472 allowable spaces be located and which entrance will serve them?*

The new garage would eliminate Lot 3 (780 spaces). The building of a 1,000 car facility would, therefore, account for 220 (1000-780) of the 472 allowable spaces. The remaining 252 allowable spaces would be placed in future building construction (such as Podium E as highlighted in the campus plan). Lot 3 today is served by the entrances of Prospect Street and Canal Road. Podium B would be served by the South Entrance. Podium E would also be served by the South Entrance.

3. *Would it be advisable to increase the BZA maximum number of allowable spaces to accommodate undergraduates now parking off-campus? Has the University studied the impact of such a change?*

The response to this question--as well as several others in this section--involve coordination between and decisions by the University and the BZA. As noted in the introduction, the University was requested to response to such questions. Their responses follow:

The University does not believe it would be advisable to increase the BZA cap to accommodate undergraduate students. In compliance with past community requests, the University established a policy which discourages undergraduate students from bringing cars to the metropolitan area. Further, the University has neither the space nor the funding to construct additional parking facilities for this purpose.

No specific studies have been made to assess the impact of raising the BZA cap.

4. *Is car pooling encouraged? How does car/employee ratio for the University (and Medical Center) compare to other large businesses in DC? Has the University used to the fullest extent possible satellite parking lots, distance learning, electronic networking, and other methodologies researched by the Department of Transportation? How does its utilization compare to the private sector?*

Car pooling is greatly encouraged by the University. Incentives to promote carpooling include a greatly reduced rate for two-person carpool parkers ($180 annually compared to $732 for a Main Campus single parker and $950 annually for a Medical Center/Hospital single parker). Three or more person carpools are free. Additional incentives include free after-hours parking, guaranteed ride home programs, and a limited number of free all-day parking stickers provided during the year.

The University does not know how its car/employee ratio compares to ratios in the area.

The University has thoroughly reviewed the possibility of using satellite parking facilities. The costs associated with such operations are exorbitant and not currently within the University's financial capabilities.

The University does have a small percentage of the work force involved in electronic networking and at-home work programs. Distance learning is not being actively considered for implementation at this time.

The University has initiated an employee-commute program known as the GUExpress on which employees are transported from park and ride locations near their home and move to and from the University each day. This program is designed to reduce the single driver vehicle impact on nearby streets. The program has one bus operating from Maryland, and the University is exploring the possibility of adding additional routes.

The University does not know how this utilization compares to the private sector.

5. *Could GU make parking available to the general public at night and on weekends in conjunction with the proposed overall Georgetown parking plan (could use GUTS shuttle service). Would the shuttle service be able to support such parking?*

The University does not believe that making parking available to the general public is in the best interest of the neighborhoods or the University. The University could neither control nor identify patrons using the parking facilities and there is no guarantee that parkers would use a shuttle system even if one were available. Open parking creates additional security problems for everyone and increases potential disruptions because of increased traffic, noise, and trash.

The GUTS shuttle system is chartered to provide service to University-associated individuals. The University is not insured nor funded to provide this type of expanded service.

6. *Why are undergraduates not allowed to park on Campus? Has the University considered this? What were its findings?*

Would it make sense to have more vigilance to monitor student parking illegally using temporary permits? Would it be appropriate for the University to design and implement an independent parking enforcement service (in conjunctions with DC DPW) to address this problem? Has the University considered any methods of reducing illegal parking by students or employees on area residential streets?

The University does not allow undergraduates living on the campus to have a vehicle on the campus. The extremely limited number of spaces must accommodate facility, staff, and visitors to the University and patients to the Medical Center, and commuting students. The University has neither the space nor the funding to construct additional parking facilities.

The University has not considered allowing students to park on campus. The University has never considered or studied this option.

Yes it would make sense to vigilantly monitor students parking illegally. However, the University Department of Public Safety is not authorized to enforce District regulations on public streets and this service must be provided by the District's law enforcement agencies.

It would not be appropriate for the University to independently enforce parking regulations. University discussions with the DPW have indicated that the District does not desire to authorize private agencies or organizations to enforce District laws.

However, the University has considered other methods to reduce illegal parking. For students, the University stringently reviews the process by which students obtain valid Zone parking permits. By D.C. law, full-time students who reside in an off-campus location within the District are authorized to obtain a Zone parking permit. The University requires that each student requesting a Zone permit first go to the Office of Transportation Management (OTM) to be screened for local and on-campus addresses. Using the University Housing data base, the weekly updated housing roster published by Student Housing, and the on-line directory of student addresses, OTM personnel check these data bases against the address listed on the student's application for a Zone parking permit. If the student's address does not match the address listed on the application, the application is pulled and the student is refused the right to apply for a Zone parking permit. If the address data base matches the off-campus address listed on the application, the

application is completed by OTM and the student is directed to the Registrar's Office for validation as a full-time student. The DPW Parking Service will not issue a Zone parking permit to a Georgetown University student without the concurrence/proper paperwork from OTM and the Registrar's Office.

For employees, the University routinely request additional diligence from the DPW Parking Service to aggressively enforce neighborhood parking regulations. The last request was made in April, 1994.

D. TRAFFIC PATTERNS AND LOADS

1. *What are the various levels of closure possible for the Prospect Street entrance? How are emergency and service vehicles defined? Is there any possibility that the entrance would in fact not be closed? If so, under what conditions and with what results?*

The current plan calls for the entrance to be closed completely to all non-emergency and service vehicles traffic upon

completion of the South Entrance. These vehicles are D.C. police, fire, and emergency vehicles, as well as University maintenance and emergency vehicles.

If requested by the community, the Prospect Street gate could accommodate limited traffic, e.g. during selected hours and/or days; or could continue to operate as a fully functional access point to the University.

2. *Concerns have been raised about the consequences of closing Prospect Street entrance and forcing anyone commuting to or from the areas north and east of the University to arrive and leave by way of the Canal Road entrance, thus adding to the Key Bridge traffic at each rush hour.*

   Other than the reference in the Draft EIS to the fact that District residents will "have to drive further to the Canal Road entrance through a somewhat circuitous route" has this changed traffic burden been studied? If so what were the conclusions?

   These changes have been studied. See response to B. DATA COLLECTION, Question 6.

3. *What is the status of the O Street entrance?*

   Currently, the O Street entrance serves only as a ceremonial entrance. As noted in an earlier response, this was closed after the 1983 EA was completed. That study showed this entrance open.

4. *How much additional congestion is anticipated at Key Bridge/Canal Road/M Street in the Build Alternatives and how will this affect the performance of that intersection?*

   The intersection for both the No Action and Build Alternatives is estimated to operate at Level of Service E. This indicates that the level of congestion would remain comparable to the current situation. Several changes in traffic patterns would affect how vehicles travel through the intersection but the number of University-generated traffic would remain about the same. The biggest change would be for traffic going to Virginia via the Key Bridge. Instead of having to arrive via Prospect Street/34th Street/M Street and making a left turn onto Key Bridge, they would be coming from the west from Canal Street and making a right turn onto the Bridge. This would potentially result in a qualitative improvement in operation of the intersection. The change, however, is too small to be calculated by the mathematical models.

5. *Page 4 of Technical Report refers to Foxhall as a 4-lane arterial. This is only true south of Whitehaven Street. Does this impact any of the calculations or results stated in the report--specifically the additional cars (Build Alternatives) referred to in Figure 14 (AM Peak-Hour)?*

   This does not affect the redistribution of traffic as shown in Figure 14. Also it does not affect the determination of the Level of Service since this is based on the current configuration of the intersection of Foxhall Road and MacArthur Boulevard. During the field survey as part of the initial data collection, it was noted that this had four lanes with two of these as parking lanes to the north. This should have been clarified in the description provided. However, as noted it was considered in the calculations and assessment of impacts.

6. *Will signalization be adequately coordinated at Canal Road intersections with Key Bridge, Whitehurst, Foxhall, and MacArthur intersections? Will it be able to minimize the congestions anticipated by any of the Build Alternatives with intersections further east and west? Is this coordination able to be accurately predicted and carried out? Is DC's traffic control system able to sustain the performance levels indicated through the next two decades?*

   Yes, these intersections along Canal Road and the Foxhall/MacArthur intersection are coordinated as part of the District Master Traffic Control System. The critical intersections in this corridor are the intersections of M Street/Wisconsin Avenue and M Street/Key Bridge.

   Traffic can not move more efficiently through the network than it can through these two intersections.

   Up to a certain point, efficient timing of intersections in a corridor can handle extra traffic. But only so much traffic can be pushed through an intersection, so additional traffic beyond that level, regardless of source, causes backup. The DPW Bureau of Traffic Services does a fine job of coordinating the signals in the city and would fine tune the signals in the corridor to accommodate any build alternative as efficiently as possible.

7. *Would there be any traffic pattern change to the north side (Res Road) of the campus other than the approximate net no-change referred to on page 21, para. 1?*

   No. There would be some changes in the volumes by direction but the overall two-way peak hour traffic volumes would remain

approximately the same. Any other changes in these traffic patterns would be related to any changes in operation of the road connecting the Medical Campus and the Main Academic Campus.

8. *With respect to new traffic patterns east of the University occurring with any of the build alternatives, has the FHWA reviewed the effect of a full time (all day) or limited (evening rush hour only) left movement of traffic headed east bound on Canal Road/M Street turning left on Wisconsin Ave?*

   DC DPW seems to have precluded this options at other times but perhaps it should be reviewed again in light of the increased eastbound traffic movement. Was any consideration given to any change in eastbound traffic turning left at the intersection of M and 33rd Street, particularly commercial traffic

The DPW Bureau of Traffic Services has no plans to allow left turns at Wisconsin Ave. because of the volume of traffic using that intersection (a left turn would lengthen the intersection cycle length too much for efficient operation). We understand D.C. is planning on keeping the left turn at 33rd St. and will encourage traffic to then turn right on Prospect St to get to Wisconsin Ave by signalizing the Prospect St/Wisconsin Ave intersection to indirectly handle the left turns you are concerned about.

9. *Was an alternative considered that included an at-grade intersection with left turn from the University to Canal Road but with no left turn from Canal Road into the University?*

To date this alternative has not been evaluated. However, as discussed in the response to next question, such an alternative could potentially be evaluated.

10. *What other interim measures or limited traffic movements could be considered as a final alternative, phase-in process or on a short-term trial basis so that the traffic burden could be distributed more evenly among the surrounding neighborhoods?*

Given the current working assumptions in our analysis, no other measures have been considered to date. With the anticipated closure of the Prospect Street entrance, the Canal Road entrance would be the only entrance to the Main Academic Campus. Other options could be considered only if this assumption were changed.

Such alternatives could include the alternatives considered in the 1982 EA as well as variations of these options. However, the current basis of analysis which includes the closing of

Prospect Street and the restriction of access between the Medical Campus and the Main Academic Campus is in response to perceived concerns from the community about the 1982 EA. Any of these new alternatives would have to include another entrance to the Main Academic Campus. This could be provided by either leaving the Prospect Street entrance open or changing the restriction on intra-Campus movements. In any case, these alternatives--as well as those previously studied--would have to be approved through the BZA approval process.

E. COSTS

1. *What would be the estimated costs of three alternatives under consideration? Which of the proposals has the best value (i.e. cost vs. performance)?*

   These are rough estimated costs - including preliminary design costs and construction engineering costs, but not including any right-of-way or utility relocation costs:

   Alternative 2 $1.7 million
   Alternative 3B $11.3 million
   Alternative 3H $17.3 million

   "Best value" is a subjective opinion. We will look at all impacts of the alternative (both quantitative and qualitative) throughout the environmental process. Each of us here have different opinions as to best alternative, as I'm sure many of your neighborhood groups do. Each of us places different emphasis on different measures and view any project through different sets of eyes, so the final alternative selected will necessarily be a compromise among these differing values.

2. *How much of Federal funding has already been appropriated? For what purposes was it allocated (analysis and/or construction)? How much has been spent? How much more earmarked?*

Approximately $6.6 million was appropriated by the 1987 highway act for this project. It can be used for anything related to the improvement of access to the University at the Canal Road entrance - environmental studies, design, construction, right-of-way, etc. As of October 31, approximately $880 thousand has been authorized for environmental studies of which $462 thousand has actually been expended so far.

3. *What matching funds would apply? How much will DC pay? Is this a typical 90/10 or 85/15 split?*

D.C. will not provide any funds to construct this project. The normal 20% share to be provided by D.C. will be considered provided when Georgetown University dedicates 2.5 acres of land to the District as permanent scenic easement (which will then be transferred to the NPS).

4. *Are there any other financial contributors? How much matching funds have been committed or expended and from what sources?*

As mentioned in the previous answer, the legislation for this project provides that Georgetown satisfies the "matching share" requirement by providing property to the NPS. In addition, in the case of any NPS property needed for the project, Georgetown University would grant a scenic easement, or other interests in land, that is approximately equal in value to the access easement needed across NPS land; Georgetown University will provide any University property needed for the project. These transfers have not happened yet since the exact needs of the project are not yet known.

5. *Who maintains the roadway now and who will maintain it in the future? What use and zoning restrictions would apply?*

The D.C. government maintains Canal Road currently. Georgetown University maintains the entrance north of the right-of-way line of Canal Road. Assuming a build alterative is selected, The D.C. Department of Public Works would then take over responsibility to maintain the signalized intersection, or any overpass/underpass structure. It remains to be worked out how far up the entrance the northern limits of their responsibility would end. There would be no "use or zoning restriction" - if by that you mean restrictions on type of vehicles or time of day usage.

Sincerely

Arthur J. Hill, P.E.
Division Administrator

cc: Mr. Jim Sinnette, EFLH
Mr. Jeff Knoedler, NPS
Mr. Tom Roth, DECA, BTCS, DED

File: DE-0014(801) (FM6162GE.LN4)

JOHN J MCGINN
5522 MACARTHUR BLVD NW
WASHINGTON, DC 20016

Mr Arthur Hill
Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street N E
Washington, D C 20002

November 7, 1994

Dear Mr. Hill:

I am a Palisades Community resident and have lived for over 10 years on MacArthur Blvd. My experience commuting, at one time or another, to Arlington, downtown in the K Street area, to the Pentagon, and now to Capitol Hill has given me some perspective on area traffic problems.

Attached is an explanation of how I see the problem and a proposal for action.

I have been working with Jim Sinnette, of your office, on this and he has been very helpful.

Thank you for your consideration,
Sincerely,

John J. McGinn
Palisades Citizen

Subject: Traffic Congestion in Georgetown/Palisades Area

To: Mr Arthur Hill
Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street N. E.
Washington, D. C. 20002

PURPOSE: This paper is offered in consideration of your proposals to solve traffic congestion in the Georgetown residential area in the vicinity of the University.

PREFACE To empty parking lots and get more traffic on already congested roads may only worsen existing traffic bottlenecks.

Any action on Canal Road to alleviate the Georgetown congestion which worsens these difficult traffic conditions will generate a strong reaction from Palisade area residents. And not only District people but also those from Virginia (Arlington and Maclean) and Maryland(Bethesda and Potomac) who commute daily to Georgetown, K Street, Capital Hill, National Airport, Rosslyn, the Pentagon, Old Town, Crystal City.... and return. There is an area wide traffic problem , as is addressed below.

PROBLEM: To develop and test and demonstrate, as necessary, a solution to the traffic congestion problem in the Georgetown residential area and along Canal Road in the Georgetown University vicinity.

DEFINITION:

◆Traffic congested areas are:
- ●Georgetown residential area in vicinity of University, particularly in the evening rush hour
- ●M Street between Key Bridge and Wisconsin Avenue, most of the time
- ●Key Bridge during all rush hours
- ●Canal Road from Key Bridge to Chain Bridge Road during all rush hours
- ●MacArthur Blvd. from intersection with Foxhall Road to Arizona Avenue during all rush hours
- ●Foxhall Road from intersection with MacArthur to Reservoir Road during all rush hours
- ●Whitehurst Freeway during all rush hours

◆Bottlenecks:
- ●On Virginia and District ends of Key Bridge during all rush hours
- ●Intersections vicinity of Canal Road, MacArthur, and Foxhall during all rush hours
- ●Chain Bridge during all rush hours
- ●Whitehurst Freeway at Canal Road at P.M. rush hour and at K Street A.M. rush hour

DISCUSSION:

- ●As is clear from the definition, an areawide traffic problem exists.
- ●Any solution to these problems should consider the area traffic conditions and not attempt to fix one while possibly aggravating other existing problems.
- ●Key Bridge is a very long-recognized bottleneck. Efforts to resolve that by widening it to six lanes and building another bridge upstream at Three Sisters Rocks have proved fruitless. The bottleneck remains.
- ●Suburban development, particularly in Northern Virginia and to a lesser extent in Maryland, has severely taxed the area road networks and also entrances into the District.
- ●Other solutions- flextime for employees, other parking areas and entrances to the University, car pools, public transportation, traffic control measures- need to be considered.
- ●Do not underestimate commuter and community rage should a solution result in aggravated traffic conditions, increased pollution and other conditions degrading community quality of life.
- ●A test and demonstration of any proposed solution to verify and show its viability is essential. Test could be simulated and must be creditable.

PROPOSALS:

- ◆Extend the traffic study area to include the following:
  - ●Georgetown residential area in the vicinity of University
  - ●M Street from Key Bridge to Wisconsin Avenue
  - ●From intersections vicinity of Canal, Foxhall and MacArthur
    - -out Canal to Chain Bridge
    - -out MacArthur to Arizona Ave
    - -out Foxhall to Reservoir Rd
  - ●Key Bridge including both District and Virginia sides
  - ●Whitehurst Freeway from Canal Road to K Street
- ◆Using the above data, make a comprehensive study of area traffic problems. This should include new traffic projections and other pertinent conditions provided by Georgetown University, the District and Arlington, Fairfax and Montgomery Counties.
- ◆Identify area traffic problems and develop a comprehensive plan to solve them. Plan should be phased, coordinated and prioritized to fix severest problems early, not penalize any county or group and make wise use of available funds- federal, district, county or state.

SUMMARY: A comprehensive approach to our area traffic problems is the surest, fairest and most economical way to get it right. Some modification to this process may be appropriate but it provides a framework within which to proceed.

John J Mc Ginn
Palisades Citizen

HFO-DC.1

December 6, 1994

Mr. John J. McGinn
5522 MacArthur Blvd. NW
Washington, D.C. 200016

Dear Mr. McGinn:

Thank you for your letter of November 7, 1994. We took the liberty of sending a copy to the D.C. Department of Public Works, who has the responsibility for the surface transportation system in the city, and to the Washington Council of Governments, who has certain regionwide responsibilities. We will recommend to them that enough people have commented on traffic issues to the Georgetown neighborhood to warrant further study by them.

The scope of our project and environmental study is limited to the general vicinity of the proposed Canal Road entrance - studying the relative effects of the proposed action on the existing system, i.e. taking the existing system as a given.

We will consider your recommendations in development of the Draft Environmental Impact Statement, but we do not anticipate extending the scope to "...develop(ing) a comprehensive plan..." as you recommended.

Sincerely,

Arthur J. Hill, P.E.
Division Administrator

cc: Mr. James Sinnette, NFLH
Mr. Jeff Knoedler, NPS
Mr. Tom Roth, DC DPW

FEDERAL HIGHWAY ADM. TEL:202-523-0181 Nov 18 94 12:40 No.003 P.01

GOVERNMENT OF THE DISTRICT OF COLUMBIA

Advisory Neighborhood Commission 2E

3265 S St. NW - Washington, D.C. 20007
Telephone 202
Fax 202-

November 8, 1994

Mr. Arthur Hill
Division Administrator
Federal Highway Administration
Union Center Plaza, Suite 750
820 First Street, NE
Washington, D.C. 20002

Dear Mr. Hill:

ANC 2E received a copy of the letter dated October 11, 1994 from the Citizens Association of Georgetown. We look forward to attending the meeting which will be scheduled for either November 21st or 22nd.

We thought that the questions posed by CAG were excellent and would add the following:

1. What considerations have you made for part-time or evening students and their parking and commuting impact?

2. What considerations have you made about the increase in people at the Medical Center?

3. Your assumption is that the University will expand by 2.6 million square feet. How do you reconcile that assumption with the Campus Plan which allows for 3,896,622 million square feet?

4. What assumptions are you making about on campus parking and the concept of valet parking?

Thank you for considering these questions.

Sincerely,

Oscar Turner (dlc)
Oscar Turner
Chairman

cc: Commissioners

BURLEITH / FOXHALL-MACARTHUR / GEORGETOWN / HILLANDALE

COMMISSIONERS:

Dianne Sawaya, District 1 — Ted Jacobs, District 3 — Beverly Jost, District 5 — Rod Johnston, District 7
Oscar Turner, District 2 — Westy Byrd, District 4 — Ed Schwartz, District 6 — Craig Davidson, District 8

HFO-DC.1

January 25, 1995

Mr. Rod Johnston
Chairman ANC 2E
3265 S St. NW
Washington, D.C. 20007

Dear Mr. Johnston:

Former Chairman Turner's November 8 letter suggested additional questions on the proposed Georgetown Southern Entrance project. We will try to respond to his comments in order of his:

1. We have focused on peak hour traffic implications of shifting existing and anticipated future traffic from the Prospect Street entrance to the movements at Canal Road, as limited by BZA caps on FTE and parking spaces. Since these are typically the most congested periods, it is assumed impacts (with or without project) would be less at other hours. Our traffic counts of existing conditions take into account part-time and evening students. Based on the BZA caps, these are not expected to substantially increase.

2. In its 1990 ruling on the 1989 Bicentennial Master Plan, the BZA noted an increase in faculty and staff for the University of 700 persons which included both the Medical Campus and the Main Academic Campus. It is noted that travel between the two campuses is restricted by keycard system.

3. The Georgetown University Bicentennial Master Plan proposes to add, by the year 2010, approximately 270,000M² [2.9 million gross square feet (GSF)] to the Academic Campus and about 84,000M² [0.9 million GSF] to the Medical Campus. This amounts to about 354,000M² [3.8 million GSF]. Based on the BZA analysis process, the proposed square footage was also shown adjusted to Applicable Zoning Area (AZA). This decreases the GSF by the areas not counted in the zoning

- more -

calculations (roughly those floors below the ground level adjacent to each individual building). The resulting AZA area is mentioned in the BZA ruling as approximately 240,000M² [2.6 million square feet AZA]. We had mistakenly referenced that lower figure earlier without explanation. This will be clarified in the draft EIS.

However, this clarification will not affect the estimates of trip making and travel. Since our proposed improvement to the Canal Road entrance does not increase traffic onto the campus, but merely redistributes the travel paths, the primary factors affecting vehicular trips to the University Campus are the projected number of students, staff and faculty, and the cap on parking. The projected increase in floor space has only a secondary and minor impact on vehicular trips to the University campus.

4. The study assumed a cap of 4,080 parking spaces as agreed to by the University as part of the 1990 BZA ruling. (See page 17 of BZA ruling) Valet parking is assumed to be eliminated after a total of 4,080 spaces is constructed.

Sincerely,

GERALD YAKOWENKO

Arthur J. Hill, P.E.
Division Administrator

cc: Mr. Jim Sinnette, NFLH
Mr. Don Goffredi, DECA, BTCS, DKD
Mr. Jeff Knoedler, NPS
Mr. Oscar Turner

nsa National Stone Association

1415 Elliot Place, N.W. • Washington, D.C. 20007-2599 • 202/

RE GEORGETOWN ACCESS on CANAL ROAD

1. Mac and Fox also provide a major access to N. Va. and well as the Balto Richmond Corridor.

2. Morning traffic flow on Canal, at the current entrance, is now completely saturated with the incoming traffic from two main routes: Foxhall/MacArthur and the inbound Canal from N.VA and MD. Putting a traffic light on lower canal would cause the flow to be disrupted from these two routes: Which route would get the priority and correspondingly which would be disrupted...

3. ANY traffic problem on either parkway (MD or VA) causes overflow onto MacArthur - the new entrance would exacerbate this...

4. The new entrance will significantly increase traffic on Canal Road. That section of road is currently in pretty bad shape. Where is the study of the impact on the STRUCTURAL STABILITY of Canal Road and the Canal?

5. Increased congestion on Mac will increase safety hazards. Two schools are in that area. What about the safety of the school children???

6. Improvements to western Canal Road will increase the traffic on lower Canal. How accounted for???

202- FAX 202-

CHARLES A. PRYOR JR., P.E.
VICE PRESIDENT ENGINEERING

NATIONAL STONE ASSOCIATION
1415 ELLIOT PLACE, N.W.
WASHINGTON, D.C. 20007

HFO-DC.1

March 14, 1995

Mr. Charles A. Pryor Jr., P.E.
1415 Elliot Place, NW
Washington, D.C. 20007

Dear Mr. Pryor:

Thank you for your undated letter received here January 4th. We will take your comments into consideration as we review the significant environmental impacts associated with the proposed improvement to the Canal Road entrance. Here are preliminary opinions on your points:

1. MacArthur, Foxhall and Canal Roads are, indeed, arterial streets. As such, they do carry traffic to major centers of development throughout the region.

2. Introducing a new light would stop inbound traffic on Canal to allow gaps to occur to permit the few morning left-turners from the University to access Canal. Upstream of this, the relative green time between Foxhall and Canal would be metered at their intersection as it is now - proportional to their volumes.

3. Major disruptions on any major facility will frequently impact other major facilities. This would occur with or without this proposed project.

4. Our traffic analysis does not show a significant increase in the amount of traffic due to the University along Canal Road for the build alternatives. We project an increase in the growth of background traffic there anyway. This background traffic is the major determinant of the pavement condition (now and in the future). Any incremental increase in traffic on the road due to shifting entrances would be offset as a burden to the District by incremental decreases on other streets leading up to the current Prospect St. entrance. Pavement condition is not a significant relative impact.

   A technical report has been prepared specifically addressing the Canal wall. It is anticipated that this report would be available at local libraries for review at the time the Draft EIS is

- more -

available. This report is not a detailed structural analysis. It recommends that additional studies be performed during the preliminary design stages to determine whether the existing wall should be upgraded to meet current AASHTO and FHWA standards. It also recommends that the existing wall not be subjected to additional loads by the proposed entrance improvements (i.e., any new structures be self-supporting). This concern would come more into play for either the overpass or underpass structures (which would change structural loadings) and to much lessor extent for a signalized intersection.

5. We are aware of the schools in the area. We are aware of current congestion. Again, the incremental change in traffic related to the shift in entrance locations (both volume and speed) is small either way. Therefore, it is not apparent that the proposed project is the cause of any increased safety hazard.

6. Any change in capacity to approach roadways (Clara Barton Parkway?) could increase traffic to downstream sections. We are not aware of any plans to increase capacity on the Clara Barton Parkway. The long range plan for the Region includes 4-laning of a 2-lane section near Glen Echo, but this would merely replace the 2-lane reversible operation there now - relieving Park Police of daily operation duties - but not adding capacity.

Sincerely,

Arthur J. Hill, P.E.
Division Administrator

cc: Mr. Jim Sinnette, EFLH
Mr. Don Goffredi, DECA, BTCS, DED
Mr. Jeff Knoedler, NPS

FOGGY BOTTOM AND WEST END
ADVISORY NEIGHBORHOOD COMMISSION (ANC-2A)

MARIA TYLER ◻ COMISSIONER ◻ SMD-2A03

949-25TH Street, N.W. • Washington, D.C., 20037 • (202)

May 17, 1995

Mr. Arthur Hill
Division Administrator
Federal Highway Administration
Union Center Plaza
820 First Street, N. E.
Washington, D.C., 20002

RE: **OPPOSITION** to the FHWA-Canal Road Entrance Project

Dear Mr. Hill:

I appreciate your sending me the Newsletters on the above project, including the latest one, Number 4, dated March, 1995.

Having served as a publicly elected and overwhelmingly re-elected non-salaried official in the District of Columbia since 1980, I wish to express **in the strongest terms my opposition to the above project,** on the following grounds.

1. In essence, the proposed "solutions" to a problem that affects a private institution and a small area of residents, **transport** the problem to another residential area. Currently Georgetown University (GU) traffic has only a few residential blocks to traverse to reach commercial Wisconsin Avenue, from where it has access to the areas it currently cannot reach from the Canal Road entrance. The proposed project would shift some of such eastbound traffic onto the residential streets of Foggy Bottom, including but not limited to the heavily populated 2500 and 2400 blocks of K Street, N.W. It should be also noted that the above 2400 block is in the purely residentially zoned Foggy Bottom Historic District. These residential street blocks of Foggy Bottom are already overburdened with traffic and air quality and noise are seriously worse than specified by federal standards. **What is needed in Foggy Bottom is respite from traffic not the redirection of additional traffic into it.**

2. In pure traffic terms, ignoring the problems of residential areas, the "solutions" shift the burden which GU commuters now face to the much larger number of other commuters currently using the Canal Road corridor. An at grade intersection would create obvious delays. Other alternatives providing for an elevated road and/or underpass would also create delays, although lesser in extent, because of merging problems. Moreover, these build alternatives with smaller delay increases would require much larger expenditures and involve large engineering projects adjacent to the sensitive and historic National Park Service property, the C. and O. Canal. With any "solution" it is doubtful if there would be a significant **net** reduction in average trip time per commuter and there might be a net increase.

3. It is also relevant that Georgetown itself vigorously opposed an improvement in public access to its area when the Metro subway system was being designed. A subway station in Georgetown would have eased the "burden" which automobile traffic now creates for its residents and businesses. Having refused to look at solutions in the past, Georgetown now wishes to export its problem elsewhere.

4. The cost of the "solutions" imposes a burden on the tax payer to benefit a few individuals and a private institution, in each case to **the detriment of others.** This should not occur, especially at a time when the Administration and the Congress are both pressing for economies in government spending. The argument that the project is of long standing and that the funding has already been approved by Congress is not convincing. The call for economies has arisen because authorities were excessively expansionary in the past, and in any case, **the cut of an already approved expenditure has the same effect as any other move to reduce the budget deficit.** Moreover, alternatives other than an at grade intersection would almost certainly require the approval of additional funds.

5. The fact that this is a "demonstration" project, which could provide an example for the future, leading to additional expenditures on other public works, is yet another reason for opposition. The proposal exports problems with little or negative net gain to the community as a whole. It benefits a small group at the expense of others. A demonstration project should be a case of clear-cut advantages and no disadvantages. The present one does not have these attributes.

In summary, the project and the use of federal funds to finance it are inappropriate.

Yours sincerely,

Maria Tyler
Maria Tyler
Commissioner, ANC-2A03

APPENDIX D-2

Public Meeting and Hearing Information Items

WELCOME

To the

PUBLIC HEARING

for

Improvements to the

CANAL ROAD ENTRANCE OF GEORGETOWN UNIVERSITY

Date: *September 19, 1995*
Location: Eckles Library Auditorium
Mount Vernon College
Time:

- **6 p.m. to 7 p.m. is an Open House Forum**
  Questions and answers with Project Team
- 7 - 7:15 p.m. Break to rearrange room
- **7:15 - 9 p.m. is Formal Oral Testimony**
  Auditorium-style, public statements only

Project Team Representatives are available to answer your questions during the Open House Forum.

Your comments are important. Comments can be provided in any of the following three ways:

1. An oral statement during the formal portion of the public hearing. A speakers' sign-up list will be located at the greeting table. Oral recorded statements are expected to begin at 7:15 p.m. A court reporter will also be available to record testimony between 6 and 7 p.m.

2. Written comment forms to be deposited in a designated box at the public hearing.

3. Written comment forms or other letters to be submitted by mail no later than September 30, 1995, and mailed to the address provided.

Federal Highway Administration -District of Columbia Department of Public Works -
National Park Service - National Capital Planning Commission

PROJECT PURPOSE

The purpose of the project is to consider improving the entrance at Canal Road of the Georgetown University. It is a demonstration project funded by the US Congress; as such, it is not intended to address internal circulation or other access to the University, or eliminate traffic congestion on local residential streets.

PROJECT HISTORY

In 1976, the United States Congress authorized a study of the intersection of Canal Road and the Georgetown University entrance. The entrance is to the university's Main Academic Campus Parking Lot. Federal Urban Mass Transportation Administration funds were authorized.

In 1982, an Environmental Assessment study was published. A signalized intersection was recommended, but was never implemented due to public concerns about traffic impacts to Canal Road.

In 1987, Congress authorized the current project in the Surface Transportation and Uniform Relocation Assistance Act of 1987. Funding of approximately $ 6 million was appropriated for the project. The 20 percent local matching share required for Federal funding is to be provided by Georgetown University in the form of a scenic easement on 1.01 hectares (2.5 acres) of land.

Several agencies share responsibility for planning and implementing this project. They include the District of Columbia Department of Public Works (DCDPW); the U.S. Department of Interior, National Park Service, National Capital Region (NPS); and two divisions of the Federal Highway Administration: the District of Columbia Division (FHWA-DC) and the Eastern Federal Lands Highway Division (FHWA-EFLHD). These agencies and the Georgetown University negotiated a Memorandum of Agreement, signed in December 1991.

PROJECT PROCESS

In accordance with the Memorandum of Agreement, the FHWA-EFLHD is responsible for the project environmental documentation and design. In October 1992, a coordination meeting was held to initiate the National Environmental Policy Act (NEPA) process. Detailed information on existing conditions, development of possible alternatives, and assessment of potential impacts of alternatives to numerous environmental factors have been performed.

The Draft Environmental Impact Statement was approved for distribution in late July, 1995. Several Technical Reports support the information summarized in the DEIS. These reports include *Traffic and Transportation; Air Quality; Noise Analysis;* and, *Analysis of the C&O Canal Wall.* In addition, an appropriately detailed Phase I archeological inventory and assessment was conducted and presented to the District of Columbia State Historic Preservation Office and to the U.S. Department of Interior.

PUBLIC PARTICIPATION

There has been an on-going program of coordination with the public on this project. The public involvement program has consisted of newsletters, presentations to community groups, and public meetings to provide a forum for community residents to voice their concern and share their ideas. A Project Mailing List was developed early in the study efforts. Additionally, written comments were received during the study process to date; the letters and responses were presented in the DEIS.

SUMMARY OF ALTERNATIVES

Alternative and Geometrics	Directional Movement at Canal Road	Status at Prospect Street Entrance	Construction Costs (est.)
Alternative 1 No Build	Right-in/Right-out	Same	None
Alternative 2 At-Grade Intersection	All directions	Closed	$1.7 m.
Alternative 2A At-Grade Intersection With Prospect Street Open	All directions – Left turn restrictions during AM peak out of G.U.	Same	$1.7 m.
Alternative 3B Westbound Elevated Ramp	All directions	Closed	$11.3 m.
Alternative 3H Grade-Separated Interchange	All directions	Closed	$20.2 m.

PROJECT ALTERNATIVES

A number of preliminary alternatives were considered for the project. They are discussed in Chapter 2 of the DEIS, and included various roadway intersection and interchange concepts, mass transit, pedestrian and bicycle alternatives, Transportation Systems Management and Transportation Demand Management techniques. These were evaluated for their ability to meet the project purpose and need.

Five alternatives were selected for further study. They are:

- **Alternative 1**, *the No Action Alternative*. Maintains the existing entrances to the academic campus of Georgetown University from Canal Road and Prospect Street.

- **Alternative 2**, *the At-Grade Intersection with Prospect Street Entrance Closed*. Consists of an at-grade intersection to allow for all movements to and from the University. Traffic signals at the intersection would control access into and out of the Main Academic Campus. The Prospect Street entrance would be closed.

- **Alternative 2A**, *the At-Grade Intersection with Prospect Street Entrance Open*. Identical to Alternative 2, except the Prospect Street entrance would remain open and prevent left turns out of the University in the morning peak period.

- **Alternative 3B**, *Westbound Canal Road Elevated*. Elevates the westbound lanes of Canal Road at the location of the entrance road. These westbound lanes would cross over an access road connecting the Canal Road's eastbound lanes to the University entrance. Eastbound Canal Road is kept at the existing grade in its existing location. The Prospect Street entrance would be closed.

- **Alternative 3H**, *Canal Road Underpass*. Depresses both the eastbound and westbound lanes of Canal Road below existing grade level. There will be a bridge over the depressed lanes, connecting the eastbound Canal Road lanes to the University entrance. The Prospect Street entrance would be closed.

Alternative 2A was added specifically as a result of public and community meetings in the Fall of 1994. It is identical with Alternative 2 for alignment, but it restricts left turns during morning peak hours from the Canal Street entrance; additionally, it maintains the entrance/exit at Prospect Street.

The construction costs have been estimated for all alternatives in 1995 dollars.

ENVIRONMENTAL FACTORS CONSIDERED

Numerous environmental factors have been considered in the evaluation of alternatives for this project. Among the issues considered are: aesthetic, natural, physical, socio-economic and historic/archeological impacts.

Aesthetic features are considered important in this wooded area, abutting National Park Service Property and national historic resources such as the Chesapeake and Ohio Canal and Towpath.. In addition to the C&O Canal, the National Park Service has responsibility for the Potomac Palisades (either side of Canal Road), the Glover Archbold Park, and, across the Potomac River in Virginia, the George Washington Memorial Parkway. All of these properties are visible to and from the project site. All of the build alternatives will require some retaining walls. The DEIS describes the views and aesthetic considerations of each build alternative.

Natural impacts include reduction in wooded areas and related habitat. All four of the build alternatives have about the same loss of grassy area, but Alternative 3H impacts the most wooded area. Potential runoff and water quality concerns are nominal except during construction of any build alternative. Best Management Practices would be applied during construction to minimize these impacts.