DOCUMENT 40



Wren Building, College of William & Mary

Mr. Arthur Hill - Division Administrator
Federal Highway Administration
Union Center Plaza - # 750
820 First Street, NE

[redacted]

Oct. 12, 1995

[redacted]

Dear Mr. Hill -

I am sorry I missed the Public Hearing on Sept. 19th. I wanted very much to be there, but could not. Since I do not have a computer, I'm writing and my voice to the many you no doubt have received protesting the widening of Canal Road for the Georgetown University campus. To say the least — it is simply preposterous! Please take what is simply preposterous! Please take what steps you can to prevent it. Many thanks for your humble attempt. Sincerely, I agree - Edith Hooper

Katherine - B. Sampson

F[1]

DOCUMENT 41

Sept. 28, 1995

Dear Mr. Hill.

I am writing in support of the Canal Road project, either Build Alternative 2 or 2A. As a resident of Prospect St. for 5 years, we have seen the traffic from Georgetown University increase to an intolerable level. The large buses headed to Metro stations literally shake my house. The number of cars during morning and afternoon rush hours, dictate when I can + cannot unload packages from my car — A solution must be found and this seems the best to date.

C[1]

Sincerely,
Carl + Jeffcoat
Ann Jeffcoat

DOCUMENT 42

FHWA - Canal Road Entrance Project at Georgetown University

COMMENT SHEET

All comments are due by Sept. 30, 1995

I ATTENDED THE PUBLIC HEARING AT MOUNT VERNON COLLEGE ON SEPTEMBER 19TH, HAD PLANNED TO MAKE THESE REMARKS IN PUBLIC, BUT TIME DID NOT PERMIT ME TO STAY BEYOND 8PM.

Planning for a highway or street change as this is a large task. I know you are aware a highway design cannot be dictated by a study of one small area only. One simple change in a highway or street configuration to satisfy a loud and vocal citizen's group may affect some other neighborhood far away. Traffic is a very pliable element. Changes, even best planned changes, are often outsmarted by drivers seeking speedy routes to one's destination.

Washington communities are ofter affected by the actions of people outside a neighborhood. Recall the recent traffic reconfiguration to satisfy security demands at The White House. Note the Whitehurst Freeway (together with Canal Road) was not put in to satisfy the demands of the neighbors, but to facilitate the Surburban commuters. This was the complaint the citizens of Arlington had toward the designs for Route 66 -- they maintained the highway adversely affected their neighborhood, and was for the primary use of people living outside of Arlington. At hand are complaints from Georgetown University and Georgetown residents concerning their road patterns. The University selfishly wants a better and grander entrance; Georgetowners likewise have made it known they do not want University traffic compounding the congestion on their streets. These are typical special interest issues that you must rise above to seek a favorable traffic solution affecting a much wider area than your study seems to indicate you have addressed.

V[1] I urge you, highway designers, to look beyond the Georgetown University Canal Road Entrance. Traffic within two miles of the proposed entrance is mess! Observe MacArthur Boulevard from Arizona Avenue to Canal Road; look at Reservoir from its onset to Wisconsin Avenue; look at the streets accessing Reservoir Road; and observe Whitehurst Freeway together with other area roads. These are traffic nightmares (or daymares, depending on time of observing). The four alternative proposals fit the classic road or street adjustment made to satisfy one citizen's group but adversely affecting others.

Please do not make a decision based on the small area of study I observed on display prior to the meeting. Rise up to the level of a large scale traffic engineer. Spend the allocated funds not on an airport type entrance, not on a proposal to quiet one or two squeaky wheels, but on a program to improve the street network within a larger affected area!

PLACE IN DESIGNATED BOX
AT THE PUBLIC HEARING
OR MAIL TO:

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

Fax: (202) 523-0181

Respectively submitted,

Alexander H. Jeffries
[redacted]
Washington DC 20007-2050

Please add me to the Project Mailing List.

09/29/1995 16:51 7035220949 CJ

DOCUMENT 43

CARRIE JOHNSON
[redacted], Arlington, VA 22201
phone/fax (703) 522-8940

September 29, 1995

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

RE: Georgetown University Entrance
Draft EIS and 4(f) Evaluation

Dear Mr. Hill:

As a long-time friend of the C&O Canal National Historic Park and the Potomac Palisades, I appreciate being kept informed about the Canal Road project through your various mailings.

I have finally reviewed the Draft EIS and the 4(f) Statement, and find that those documents leave several important park-related issues unresolved:

AX[1] **1) Condition and vulnerability of the Canal wall:** It is surprising and dismaying to find that questions about the long-term strength and stability of this key historic structure have not yet been resolved, and apparently may be addressed in detailed studies only after an alternative has been picked. Indeed, the EIS generally skirts the entire subject of the condition and possible frailties of the Canal wall; the best indication of experts' concerns (short of the technical report, which I have not seen) is in your letter to Charles A. Pryor, Jr. (March 14, 1995, in appendix D-1). This issue needs more attention now. A design requirement of no additional stress is no substitute for the most careful analysis of the structure -- and the costs of any needed improvements -- before an option is chosen.

BK[2] In addition, the unsettling impact of extensive blasting and excavations near the wall under some alternatives (p. 4-25) does not seem to have been considered at all. The assertion of "no impact" on the wall during construction of any alternative (Table 4-6, p. 4-26) seems wishful at best.

2) Visual impacts on the Palisades: The impacts of various options on views of the Georgetown Palisades, as seen from the C&O towpath, the Potomac River and the Virginia shore, are set forth well in the Draft EIS (p. 4-5 and 4-6, and Figures 4-5 and 4-6). The elevations confirm that Alternatives 3B, with its elevated road and 450-foot-long retaining wall, and 3H, with its 750-foot-long retaining wall, would be substantial visual intrusions on a key section of the green Palisades.

The draft 4(f) Statement, however, takes a very different and quite cavalier view.

DOCUMENT 43

BK[3] With no reference to the analyses in chapter 4, the 4(f) Statement declares on p. 8-8, and again on p. 8-9, that even 3B and 3H "would have negligible effect on the use or overall function of the NPS lands along Canal Road." And why? Because "this area is used only for landscaping and visual purposes." This suggests that the only parklands that matter are those used for active recreation. You should not need reminding that the primary purpose of the Palisades park is to preserve and protect a priceless natural landscape and historic scene. In my view, this lack of analysis, not to mention any differentiation among alternatives, makes the 4(f) Statement sadly perfunctory. In accord with the statutory purpose of minimizing losses of parklands, I would expect it to be even more attentive than the EIS to the differing impacts of various alternatives on the Palisades.

P[4] 3) **Secondary impacts:** Obviously the key issue of access to the Riders' Fund property for potentially conspicuous townhouse development is complicated and unresolved. Nonetheless, the statements (p. 8-9 and elsewhere) that this issue "will be determined as a result of coordination of this 4(f) documentation" are highly unhelpful, leaving citizens to wonder what is likely to be decided by whom, in whose interests, with what (if any) public notice, and when.

I trust that these comments are helpful.

Sincerely,

Carrie Johnson

Carrie Johnson

DOCUMENT 44

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Advisory Neighborhood Commission
2E
[redacted] - Washington, DC 20007
[redacted]
September 29, 1995

Mr. Arthur Hill
FHWA
820 First Street, NE Suite 750
Washington, DC 20002

Dear Mr. Hill:

C[1] This letter is to convey to you our support for Alternative 2 or 2A regarding the Canal Road demonstration project. In our view it will greatly improve traffic conditions in Georgetown, will put traffic on streets better suited for it, and will remove inappropriate truck and bus traffic from local streets. It is the best alternative because it creates these benefits without a significant detriment to residents or commuters from other areas, and is least expensive and has the least visual impact.

Thank you.

Truly yours,

Rod Johnston, 2E-07 Chairman | Craig Davitian, 2E-08 | Ted Jacobs, 2E-03 | Jonda McFarlane, 2E06

DOCUMENT 45

JEROME E. JOSEPH
[redacted]
Potomac, Md. 20854

FHWA Regional Director Arthur Hill

Dear: Mr.Hill:

As a resident of Maryland and commuter to the District, I have just spent 3 stressful years commuting during the reconstruction of Canal Road. I am outraged to hear that a plan has been proposed to The Federal Highway Administration on behalf of Georgetown U to create even more headaches to my daily commute.

AX 1 I realize that GU has a very big presence in Georgetown offering the community numerous benefits however, I in no way want my commute to become more of a hassle then it already is. The plan, as I understand, will not only impact traffic but could be an ecological disaster for the C&O Canal, and a very old and beautiful historic town.

I moved to Maryland from New York where I experienced a very hectic commute to New York City daily. Moving here has afforded me a better way of life, more time with my family all due to less of a daily commute. I would hate to see all this come to a halt because GU wants easier access to the Key Bridge and a GU LANE ONLY on Canal Road all for a new vanity entrance to the University.

F 2 PLEASE DO ALL YOU CAN TO STOP THIS!

Jerome E. Joseph

DOCUMENT 46

ALICIA JUARRERO
[redacted]
Washington, D.C. 20007-2019

September 19, 1995

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

Dear Mr. Hill:

BD 1 I write to express my strong opposition to the Canal Road Entrance project as currently proposed. I teach at Prince George's Community College's Andrews Air Force Base extension center in the afternoons. When I leave my house at approximately 4:00 pm, the southbound traffic flow on Foxhall continuing on to Canal Road going towards Key Bridge, is so congested that it takes me an average of 18 minutes to get from my house to the bridge exit, a distance of less than one and one half miles! This same congestion occurs on pleasant weekend afternoons. Being able to turn left onto the Georgetown University campus will simply make matters worse, as it would divert traffic that currently goes through Reservoir Road onto Canal Road.

P 2 The lack of specificity in the EIS regarding the potential development of the Riders Trust property that may take place as a result of the projected road is even worse. What kind of residential property and how many could be built? What kind of commercial property could be built? What would the consequences -- probably adverse -- be for the residents of Foxhall Village and neighboring communities? No proposal that does not address and answer these questions should be approved.

B 3 Only Alternative #1 of DEIS is acceptable. I strongly urge you: Do not build.

Sincerely,

Alicia Juarrero

Alicia Juarrero, PhD

cc: Brian Harrington
Judith Dollenmayer

DOCUMENT 47

FHWA - Canal Road Entrance Project
at Georgetown University

COMMENT SHEET

All comments are due by Sept. 30, 1995

F[1]

All the alternatives assume rational, civic-minded behavior on the part of motorists. As it stands today, in the am eastbound on Canal road numerous motorists block the right hand lane (intended as a turn off to the Whitehurst) attempting to cut into the left hand lane to M St.

Can you imagine what a 4 vehicle only left turn area will do?

Please add me to the Project Mailing List
check ☐

PLACE IN DESIGNATED BOX
AT THE PUBLIC HEARING
OR MAIL TO:

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

Fax: (202) 523-0181

Name: ALICIA JUARES
Address: [redacted]
DC 20007

DOCUMENT 48

Mrs. Barbara F. Kahlow
[redacted]
Washington, DC 20037

September 21, 1995

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

Re: FHWA-DC-EIS-95-01-D
Draft EIS for the Canal Road Entrance to Georgetown University

Dear Mr. Hill:

This letter follows up both on my oral testimony (a copy of my written testimony is attached) September 19, 1995, on the draft environmental impact statement (EIS) for the Canal Road entrance to Georgetown University (GU) and on a telephone call I received the next day from Mr. Gerald Yakowenko. Mr. Yakowenko asked me to write the Federal Highway Administration (FHWA) to officially request a FHWA legal opinion on the meaning of "without decreasing the efficiency."

Sec. 149(a)(14) of Public Law 100-17, the Surface Transportation and Uniform Relocation Assistance Act of 1987, places a requirement on the Secretary of Transportation regarding this demonstration project that the project shall be carried out "without decreasing the efficiency of a Federal-aid primary highway." Both Canal Road and the Whitehurst Freeway are Federal-aid primary highways. The legislative history of the Act in House Conference Report No. 100-27 does not elaborate on this statutory language.[1] Mr. Yakowenko informed me that it is FHWA's "interpretation" that a "reasonable" decrease in efficiency for the Whitehurst Freeway is allowable. I find absolutely no basis in either the law or its legislative history for this ("reasonable" decrease) interpretation for either Federal-aid primary highway and I believe it is erroneous.

I do not believe that the draft EIS fully accounts for the additional peak PM traffic to be added to the Whitehurst Freeway under any of the build alternatives. Nonetheless, the draft EIS clearly

[1]However, the legislative history does specify that Georgetown University is the private party which would need to designate at least 2.5 acres of land.

shows[2] that there will be additional PM rush traffic to the Whitehurst Freeway of at least 158-220 cars under any of the build alternatives. In my testimony, I requested that FHWA fully account for the additional peak PM traffic.

Given the plain language of the statute and the traffic findings to date, I believe the increase in traffic onto the Whitehurst Freeway negates FHWA's further consideration of any of the build alternatives, i.e., there is a fatal flaw in consideration of any build alternative.

If you need any additional information from me, I can be reached during the day on 202-395-3053. Thank you in advance for ensuring a thorough legal analysis of this issue.

Sincerely,

Barbara J. Kahlow

Attachment

c Mr. Gerald Yakowenko, FHWA
Ms. Carol Jacoby, FHWA

[2]Even without GU's full addition of 3.8 million square feet of building floor area by year 2010.

Testimony of Barbara Kahlow
before the FHWA and DPW
on the Draft EIS for the Canal Road Entrance To Georgetown University
Document No. FHWA-DC-EIS-95-01-D
September 19, 1995

I, Barbara Kahlow, am immediate past-Vice President of the Foggy Bottom Association, the largest civic association in Foggy Bottom-West End; however, I am testifying today as an individual citizen who is concerned about the traffic impact on Foggy Bottom-West End of possible changes to the Canal Road entrance to Georgetown University (GU). My testimony today raises questions that I believe need to be more fully addressed in the final Environmental Impact Statement (EIS) to be prepared by the Federal Highway Administration (FHWA) in concert with the DC Department of Public Works (DPW).

BH[1] Page 3-3 of the draft EIS states that GU will add 3.8 million square feet of building floor area by year 2010 without a change in enrollment. If there is no change in enrollment but an "increased emphasis on research and graduate-level study," there will be more non-students on campus to utilize this enormous increase in space. A high percentage of these individuals will no doubt commute to GU by car. I did not find evidence in the draft EIS to reflect this inevitable increase in cars. Please include an estimate for this increase in traffic volume in the final EIS.

BC[2] Table 3-5 on page 3-14 reveals that, currently, 10.6 percent of GU AM traffic arrives via the Canal Road entrance from the Whitehurst Freeway but only 0.2 percent depart using the Canal Road entrance for the Whitehurst Freeway "Since this traffic cannot get to the Whitehurst Freeway easily from either" the Canal Road or Prospect Street entrances. Under Alternatives 2 and 2A, the only "build" alternatives that are effectively left on the table, there will be easy access to the Whitehurst Freeway. Therefore, there will most probably be at least a 10 percent increase in GU PM traffic using the Whitehurst Freeway.

BH[3] Table 4-1 on page 4-11 reveals that, under Alternatives 2 and 2A, in the PM rush, there is expected to be an increase of 158-220 cars leaving GU using the Canal Road travelling East of the Entrance, i.e., in the direction of the Whitehurst Freeway (and M Street/Pennsylvania Avenue). Can the already overburdened Whitehurst Freeway accommodate these cars without even further backups into Foggy Bottom-West End? Is the increase from the unspecified increase in GU staff to be employed in the 3.8 million square feet reflected in the 158-220 estimate? Is the 10 percent increase in GU PM traffic using the Whitehurst Freeway fully factored into the 158-220 estimate?

CG[4] Please note that Table 4-2 indicates that the Canal Road and Whitehurst Freeway intersection has intersection capacity exceeding F LOS in the PM under Alternatives 2 and 2A. In the final EIS, please include estimates, instead of asterisks, for 1996 and 2016 under the No Build, 2 and 2A Alternatives. DPW has extensive traffic analyses from its consideration of alternatives for the East End of the Whitehurst Freeway which should be factored into the final EIS by FHWA.

BC[5] Lastly, my reading of P.L. 100-17 is that FHWA cannot make a change in the Canal Road entrance which will decrease the efficiency of the Whitehurst Freeway, which is a Federal-aid primary highway.

BH[6] The bottom line is that I recommend that the final EIS specifically address the PM traffic impact of Alternatives 2 and 2A on Foggy Bottom-West End, including any decrease in efficiency of the Whitehurst Freeway. Thank you for your consideration of my views.

DOCUMENT 49

PROSPECT HOUSE
[redacted]
Washington, DC 20007

Mr. Arthur Hill
FHWA, Suite 750
820 First Street
Washington, DC 20002

Dear Mr. Hill:

C 1 My being unable to attend the September 19 FHWA hearing at Mt. Vernon College has caused me great concern. I know too that others like me that support the Canal Road project, supporting Alternative 2 (or 2A) that could not attend the public hearing, want to be heard.

The Georgetown community and especially those who live on Prospect Street as I do deserve some relief. We were blessed when Georgetown University agreed to close its Prospect Street entrance to all except emergency and maintenance vehicles when Canal Road is modified. Prospect Street is a narrow residential street designed for only local traffic. Each day 4,300 cars enter and leave the Georgetown University campus via Prospect Street. This creates a massive traffic jam daily. Few cars use the University's main entrance on Canal Road, NW, an arterial street engineered to handle commuter traffic. To encourage commuters to use Canal Road instead of our local streets would give the residential neighborhood much needed relief.

We live in a city in crisis and Georgetown is trying to make a difference. Please help us

Sincerely,

Lorraine Kelly

September 21, 1995

DOCUMENT 50

11/30/95 17:17 ☎

From: Joe Kiriacos To: Congresswoman Connie Morella Date: 10/19/95 Time: 14:57:18

OCT 23 1995

Page 1 of 1

FAX COVER PAGE

The Advisory Board Company

To: Congresswoman Connie Morella	For Information Call: 202-672-5611
From : Joe Kiriacos	At: The Advisory Board Co
Pages: 1	Fax Number : 202-338-1720

Dear Public Official:

CM 1 I am in receipt of a flyer outlining the proposed changes to the structure and flow of Canal Road as it relates to Georgetown University. Being an everyday commuter on Canal Road, I am deeply concerned about any changes that directly affect my route. However, I would rather not make a stand without having the full details of the proposal before me.

With this in mind, I would like to request further information on the proposed changes. Please include information on the sources of funding for this project, the anticipated cost, and a schematic outline of the finished roadway. Further, please include any geographical concerns, such as the effects on the canal, the effects on DC's pipe systems, and the destruction of the natural scenery. Lastly, please provide information on the time horizon of this project, including the date construction would begin and end, plus the road changes during construction.

Your assistance in this matter is greatly appreciated. I consider myself a responsible member of society and would like to weigh the pros and cons of this proposal before forming any opinions.

Please send the information to:

Mr. Joseph Kiriacos
Manager, Accounts Receivable
The Advisory Board Company
[redacted]
Washington, DC 20037

Joseph Kiriacos
Manager, Accounts Receivable

1100 16th St. NW 20036

Cover pages by DeMco

FROM : GEORGETOWN STUDENT ASS .ATION PHONE NO. : 2

DOCUMENT 51

GEORGETOWN UNIVERSITY

Student Association

October 13, 1995

Mr. Arthur Hill
Federal Highway Authority

Mr. Hill:

E 1 On behalf of the nearly 5,500 undergraduate students of Georgetown University, the Georgetown University Student Association hereby expresses its strong support for the Canal Road Project. The 2A alternative, which appears to have the most support among area residents, will alleviate traffic problems for students as well as for residents in the area. It is a necessary improvement to the current traffic situation.

Please feel free to contact us at (202) 687-3647 for additional information or comments. We appreciate the opportunity to address this issue.

Sincerely,

Raj Kumar
Vice President

PO Box 2239 Washington DC 20057-0001
202-687-3436

DOCUMENT 52

Anthony J. LoPinto
[redacted]
Washington, D.C. 20007

September 7, 1995

Mr. Arthur Hill
FHWA, Suite 750
820 First Street, N.E.
Washington, D.C. 20002

Dear Mr. Hill:

I am writing you today as a concerned resident of Georgetown about the current traffic situation at Canal Road and 34th Street, N.W.

A 1 It has come to my attention that a determination is being made that will hopefully change the traffic pattern at Canal Road. As a homeowner in the Georgetown community, I am concerned about the heavy traffic in Georgetown and **strongly support the Canal Road project** which will help alleviate the current traffic problem in my neighborhood.

Thank you for your attention to this matter.

Sincerely,

Anthony J. LoPinto
[redacted]

DOCUMENT 53

ALICE NEFF LUCAN, ESQ.
[redacted]
WASHINGTON, D.C. 20007-2010

September 26, 1995

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

RE: Protect Canal Path Access

Dear Mr. Hill:

I am told you are the person to whom I should address inquiries about the Georgetown University Canal Road Entrance. Perhaps you are aware there is a pedestrian/bike tunnel under Canal Road and the canal itself, adjacent to the intersection with FoxHall Road. I would guess that hundreds of D.C. residents and visitors use this as an entrance to the Canal Path hiking trail and bike path. It allows a commute to downtown, an exercise route, dog walks and recreational pleasures on the weekend.

AZ 1 Please tell me to whom should I address a letter with a reminder that this important passage-way should not be destroyed or blocked, even for a day, whatever the outcome on the larger project. Thank you for your advice.

Sincerely,

Alice Neff Lucan

DOCUMENT 54

Foggy Bottom and West End
Advisory Neighborhood Commission (ANC-2A)
[redacted] ◆ Washington, D.C. 20006 ◆ [redacted]

September 29, 1995

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

RE Canal Road Entrance Project

Dear Mr. Hill:

This letter transmits Resolution #95-9B, passed at a special meeting held on September 28, 1995, a quorum present and voting.

Sincerely yours,

Sara Maddux

Sara Maddux
ANC2A Chairperson

FOGGY BOTTOM/WEST END ADVISORY NEIGHBORHOOD COMMISSION (ANC-2A) passed the following Resolution #95-9B

RE Canal Road Entrance Project Document No. FHWA-DC-EIS-95-01-D

Whereas the Federal Highway Administration (FHWA), in concert with the D.C. Department of Public Works (DPW), prepared a draft Environmental Impact Statement (EIS) for the Canal Road entrance to Georgetown University (GU); and

Whereas the draft EIS includes a no build alternative (Alternative 1) and several build alternatives 2 and 2A); and

1 H Whereas page 3-3 of the draft EIS states that GU will add 3.8 million square feet of building floor area by year 2010 without a change in enrollment. If there is no change in enrollment but an "increased emphasis on research and graduate-level study", there will be more non-students on campus to utilize this enormous increase in space. A high percentage of these individuals will no doubt commute to GU by car. The draft EIS does not seem to reflect this inevitable increase in cars and, thus, the final EIS should include an estimate for this increase in traffic volume; and

2 Whereas Table 3-5 on page 3-14 reveals that, currently, 10.6 percent of GU a.m. traffic arrives via the Canal Road entrance from the Whitehurst Freeway but only 0.2 percent departs using the Canal Road entrance for the Whitehurst Freeway "Since this traffic cannot get to the Whitehurst Freeway easily from either the Canal Road or Prospect Street entrances. Under Alternatives 2 and 2A, there will be easy access to the Whitehurst Freeway. Therefore, there will most probably be at least a 10 percent increase in GU p.m. traffic using the Whitehurst Freeway; and

3 Whereas Table 4-1 on page 4-11 reveals that, under Alternatives 2 and 2A, in the p.m. rush, there is expected to be an increase of 158-220 cars leaving GU using the Canal Road traveling east of the entrance, i.e., in the direction of the Whitehurst Freeway (and M Street/Pennsylvania Avenue). It is unclear if the increase from the unspecified increase in GU staff to be employed in the 3.8 million square feet is reflected in the 158-220 estimate and if the 10 percent increase in GU p.m. traffic using the Whitehurst Freeway is fully factored into the 158-220 estimate; and

4 Whereas Table 4-2 indicates that the Canal Road and Whitehurst Freeway intersection has intersection capacity exceeding F LOS (the worst service level category) in the p.m. under Alternatives 2 and 2A. The final EIS should include estimates, instead of asterisks, for 1996 and 2016 under the No Build, 2 and 2A Alternatives; and

5 Whereas the traffic flows under any build alternative for the Canal Road entrance would increase traffic congestion and lengthen peak p.m. periods of traffic in Foggy Bottom/ West End; and

DOCUMENT 54

THE FOGGY BOTTOM AND WEST END ADVISORY NEIGHBORHOOD COMMISSION (ANC-2A) passed the following Resolution # 95-9B

BF 6 Whereas traffic on the affected streets in Foggy Bottom/ West End is in many places already operating at the worst, heavily congested capacity during peak p.m. periods (at level of service F), with resultant problems for pedestrian safety, damage to the Foggy Bottom Historic District properties from traffic vibrations, and air and noise pollution seriously exceeding Federal standards; and

CH 7 Whereas conditions - outside the immediate area of GU, e.g., in the Foggy Bottom/West End - of pedestrian safety, traffic vibrations, and air and noise pollution have either not been addressed at all in the draft EIS or been examined only very superficially; and

CH 8 Whereas any increase in p.m. traffic from the Canal Road entrance into Foggy Bottom/West End would exacerbate the enumerated existing problems which negatively effect quality of life; and

J 9 Whereas the cost of any of the build alternatives shifting traffic from one area to other heavily trafficked areas would negatively impact Federal and D.C. taxpayers to the benefit primarily of a private non-taxpaying institution and to the detriment of multitudes of taxpaying residents; and

BC 10 Whereas P.L. 100-17 clearly specifies that FHWA cannot make a change in the Canal Road entrance which will decrease the efficiency of a Federal-aid primary highway. Both the Whitehurst Freeway and Canal Road are Federal-aid primary highways.

AD 11 Be it therefore resolved for all the reasons stated herein that the Foggy Bottom and West End Advisory Neighborhood Commission (ANC-2A) request that the final EIS specifically address the p.m. traffic impact of Alternatives 2 and 2A on Foggy Bottom/West End, including any decrease in efficiency of the Whitehurst Freeway, and all other environmental effects; and

BH 12 Be it further resolved that ANC-2A requests that the final EIS include a FHWA legal opinion about any change which would result in any decrease in efficiency of Canal Road and/or the Whitehurst Freeway; and

B 13 Be it further resolved that ANC-2A strongly opposes any of the build alternatives, including Alternatives 2 and 2A, and, thus, supports no build Alternative 1.

Date:

	AYE	NAY	ABSTAIN	ABSENT	MOVED	SECONDED
SMD 01 SWIFT				X		
02 GEROE	X					
03 TYLER	X				X	
04 BARNHARD			X			
05 MILLER	X					X
06 MADDUX	X					

SECRETARY

DOCUMENT 55

MICHAL W. MAINWARING

[redacted]
WASHINGTON D.C., 20007

September 14, 1995

Mr. Arthur Hill
FNWA, Suite 750
820 First Street, N.E.
Washington, DC 20002

Dear Mr Hill:

D[1] I write to ask your support for Canal Road, Alternative 2. The traffic to and from Georgetown University is extremely heavy, particularly on Prospect Street, where I live and [redacted] around the corner. Prospect is so heavily trafficked that it is dangerous to work on my front garden. The other day, for the day, far too many cars at a fast speed. My neighbors have trouble pulling in and out of their driveways. Un short, and in effort to maintain the appearance and atmosphere of this lovely area is needs must.

The Prospect Canal Rd. extension to GU would not only help a great deal, but has little effect on homeowners; there are virtually none along that part of the road.

I would also mention that the trees [redacted] so much to the area are

DOCUMENT 55

continually stressed by the [illegible] & auto emissions. The Canal Road extension proposal has tremendous support in our neighborhood and I hope you'll agree to support it.

Sincerely,

Michal Mainwaring
(Mrs.)



DOCUMENT 56

ACTION
is assigned to
FHWA

25 October, 1995

To Whom It May Concern:

I am a resident of Montgomery County and I commute to Arlington, Virginia every day using either the Clara Barton Parkway or the George Washington Parkway. Each route has many difficulties and my 15 mile commute frequently takes more than one hour.

I recently learned of Georgetown University's plan to add a traffic light on Canal Road and to add GU-only lanes to Canal Road. I strongly oppose this plan. I also strongly object to using tax dollars to modify the entrance to the university. J 1

I urge you to decline to support these changes and vote against any impending legislature that would enact these changes to the university and surrounding roadways. F 2

Sincerely,

Vinnie McCollough

Vinnie McCollough
[redacted]
Rockville, MD 20852

[illegible] 22 A9:22

TOTAL P.01

DOCUMENT 57

:fk
Francis Scott Key Foundation

September 25, 1995

Mr. Arthur Hill
FHWA
820 First Street, NE Suite 750
Washington, DC 20002

Dear Mr. Hill:

I would begin by thanking the FHWA for its long and careful process in regard to this project. Since 1993, it has held 3 public hearings, sent out 4 newsletters, been available at all times to answer questions, and has allowed over 60 days for public comment to the DEIS. Its performance has been a model of good governance.

I write to you as someone who is affected by this project on three levels. As the ANC commissioner in whose district this project will occur, I bring to you the voices of countless residents who have called, written and spoken to me of their great desire for relief to the current problems of traffic and pollution. As Executive Director of the Francis Scott Key Foundation, which created the park at Key Bridge and M Streets and whose new Francis Scott Key Education Center will be at 34th and M Sts., I see the impact of the traffic backup every day. As a resident on Prospect Street, living between 34th & 35th Sts., I watch every day as trucks, busses, and cars literally inch their way through this chokepoint, spewing carbon monoxide and black dust into our lungs and homes. If I have the misfortune to have to return to my neighborhood between the hours of 3:30 and 6:30 p.m., it can take me as long as twenty minutes to travel the last few blocks to my home. There is no question in my mind that there is indeed a serious problem and that residents are cheering the FHWA's effort to improve their quality of life.

<u>How will implementing one of the build alternatives help residents?</u>

1. Most simply, it will relieve the massive tangle that takes place for three hours every afternoon on Prospect St., 34th St., and 35th St. Rush hour is longer in the vicinity of the University, as classes break earlier and then regular commuter traffic mixes in. Taking the university traffic out of the mix will allow commuter traffic

[redacted]. DC 20007 Phone [redacted] Fax [redacted]
A nonprofit, tax-exempt organization

coming from upper Northwest and heading for Virginia to flow through the neighborhood more quickly. It will also mean that emergency vehicles -- frequently called to the University -- will be able to move through the corridor more quickly and more safely.

2. A major benefit will be that all truck and bus traffic to and from the University -- at all hours -- will then be able to be routed in and out of the Canal Road entrance, removing this one element totally out of the mix, and helping to relieve the problems of backup, road damage, noise and pollution caused by this inappropriate use of neighborhood streets.

3. Air quality in the neighborhood will vastly improve. Not only will there be fewer vehicles, the fact that they will not be virtually "parked" with their engines running for long periods of time will greatly lessen the pollution.

4. The bulk of the traffic will utilize arterial roads that are built to withstand it, rather than fragile neighborhood streets. Homes will also benefit from a reduction of building-rattling traffic.

5. Finally, almost <u>all</u> the traffic will move better. Surely that coming through the corridor described will, but also traffic moving through Georgetown on M St. (because the huge tie-up at 34th and M will be vastly eased).

<u>Which solution is best?</u>

Actually, any of the build solutions would serve to alleviate the traffic and pollution problem for Georgetown, but residents care about other issues as well. For the following reasons, we would opt for either 2 or 2A:

1. We do not wish to solve our problem at the expense of our neighboring communities. A traffic light allows the most flexibility for possible adjustment in the future. Changes can be made in the operation of the light, including timing, turning it off during the morning rush hour (which is acceptable to Georgetown residents and should eliminate the "upstream" problem), setting it to flashing for late night/holiday times, and adjusting the times when left turns can be made. It also allows further study on the closing/opening of Prospect St.

2. It is the least invasive solution environmentally. Both the overpass and underpass alternatives would be disturbing to the C & O Canal and river views, and would have enormous impact on the palisades there.

DOCUMENT 57

3. It is the least costly. At $1.7M, it costs less than a third of the budgeted amount, a significant benefit.

<u>What about opposing arguments?</u>

1. The great concern of "upstream" residents is that they will suffer greater delays. It seems, however, that they need not be overly concerned for two reasons:
   - Georgetown residents are willing to leave the light off in the eastward direction in the morning, a zero-impact solution for upstream commuters.
   - FHWA traffic studies indicate only a 10-15 second delay in the afternoon for those commuters heading west.

   We are hopeful that this response to their concerns for the morning rush hour will result in a corresponding willingness on their part to accept the 10-15 second per car delay in the afternoon for an enormous benefit for Georgetown residents.

3. As for concern about the impact of the expanded Canal Road entrance on the University's building plans, we would respond that those are set by the BZA-approved Master Plan, not by this project -- and that when that building takes place, we will be even more grateful to have the additional construction and delivery traffic coming and going on a major arterial and not through local streets.

4. To those who are concerned about the loss of some of the woods along Canal Road, or who worry about the landscaping treatment of retaining walls, and so on, we would state that we share those concerns. But everything in life is "compared to what," and the relief we will experience when this project is completed will far outweigh those possible negative outcomes. There are ways to mitigate many of those concerns, but only an expanded Canal Road entrance can resolve the traffic, noise and pollution problems of Georgetown residents.

P 1

5. We share the concern regarding the proposed development of the Riders' Fund property, and urge the FHWA to determine, as promptly as possible, whether access to the site is indeed possible, as Mr. Gordon claims, whether or not the Canal Road project is built. If it is, then the prospect of that development should not enter into the decision regarding whether or not to build the Canal Road project. If access is only possible through building the Canal Road project, then we would urge the FHWA, the University and the National Park Service to work together to purchase the property and thus protect the palisades.

6. Finally, to those who say that the study is incomplete and that more information is

needed, we would quote Senator Alan Simpson, who once said "Every important decision I have had to make in my life has been made on the basis of too little information." So often in our lives, we wish for more assurance that our choices will be good ones But at some point, the effort to "get more information" becomes a roadblock that prevents resolution. This project has been studied since the late 1970's, and it is now time move forward to a decision.

C 2 | We ask the FHWA to make its decision for Alternative 2 or 2A. Thank you.

Respectfully yours,

Jonda McFarlane
ANC 2E-06 Commissioner

Executive Director
Francis Scott Key Foundation

Dorothy Miller
Commissioner ANC 2A05
[redacted]
Washington, D.C. 20037

[redacted]

October 1, 1995

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

RE: OPPOSITION to Build Alternatives for Canal Road Entrance Project

Dear Mr. Hill:

As Vice President of Columbia Plaza Apartment Complex housing over 1,000 people and as a publicly elected non-salaried official to be the Commissioner for ANC2A05, I wish to object on the behalf the District residents I represent in both capacities, to all of the build alternatives for the Canal Road Entrance Project suggested in FHWA Draft Environmental Impact Statement. My written statement is a follow up ANC2A's Resolution 95-9B and for my strong support of the 'NO BUILD ' Alternative I.

B 1 |

The ANC2A's District 5 which I represent has been heavily impacted by additional traffic on Virginia Avenue resulting from the closing of Pennsylvania Avenue and E Street. The traffic on Virginia Avenue has now double with the closings of these streets. Your report was probably being complied at the time these changes were taking place and with no follow-up in place by your staff as to which way the incoming and outgoing traffic would adjust to these changes in our area. Your EIS Statement failed to consider these closings or the traffic impact these two street closing would have on the Foggy Bottom/West End neighborhood.

AU 2 |

Virginia Avenue is now operating at congested capacity during work days and severely congested capacity when the Kennedy Center is in operation. So, by adding as your report suggest a "small increase" in traffic on our neighborhood streets, is like adding a drop to a full cup, it would make it run over.

The Kennedy Center just completed renovating their garages putting a burden on this area's parking. Now that the Kennedy Center has begun work on outside repairs over Rock Creek Parkway, the Parkway from Virginia Avenue to the Memorial Bridge for safety reasons, is closed to traffic in off rush hours. This is causing backup traffic on Virginia Avenue. Virginia Avenue is now operating at congested capacity during work days and severely congested

DOCUMENT 58

capacity when the Kennedy Center is in operation. This you might say is temporary but so is the Brenner Race and other sport events on the river that cause such traffic havoc for this area now.

Two other contributing factors to congestion on the streets in my District are George Washington's ever increasing student enrollment that walk and bicycle the streets of Foggy Bottom/West End and the out-of-town visitors to Watergate and the Kennedy Center.

J 3 This is an extraordinary expense for the convenience of a few and for the benefit of a non-taxpaying institution that would cause severe adverse traffic conditions to thousands of residents in another neighborhood. The residents in my District find the use of federal funds at this time for this purpose inappropriate and unacceptable

In summary, for these and other reasons not covered in your EIS Draft, I join the representatives of other neighborhoods surrounding the small area for whom relief is being sought to strongly oppose any of the build-alternatives for the Canal Road Entrance Project and join in the support of ANC2's Resolution in supporting the existing no-build Alternative.

Yours sincerely,

Dorothy Miller

Dorothy Miller, Commissioner
ANC-2A05

Attachment: (1)

DOCUMENT 59

ARTHUR COTTON MOORE/ASSOCIATES, P.C.
ARCHITECTS PLANNERS
WASHINGTON HARBOUR
[redacted], WASHINGTON, D.C. 20007
[redacted]

28 August 1995

Mr. Arthur Hill
FHWA
Suite 750
820 First Street, N.E.
Washington, D.C. 20002

re: Georgetown University - Canal Road Intersection

Dear Mr. Hill:

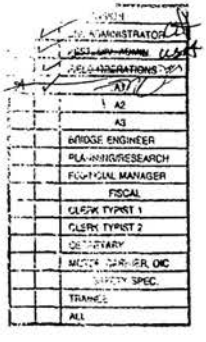
I know you are looking at options, but I would like to know how the at-grade signalized intersection responds to the 3 questions on the enclosed sketch. For me to make a comment, I need the answers to these questions, and would appreciate a note from you.

Mrs. Moore and I are affected owners (apartment bulding at 3633 M Street N.W.).

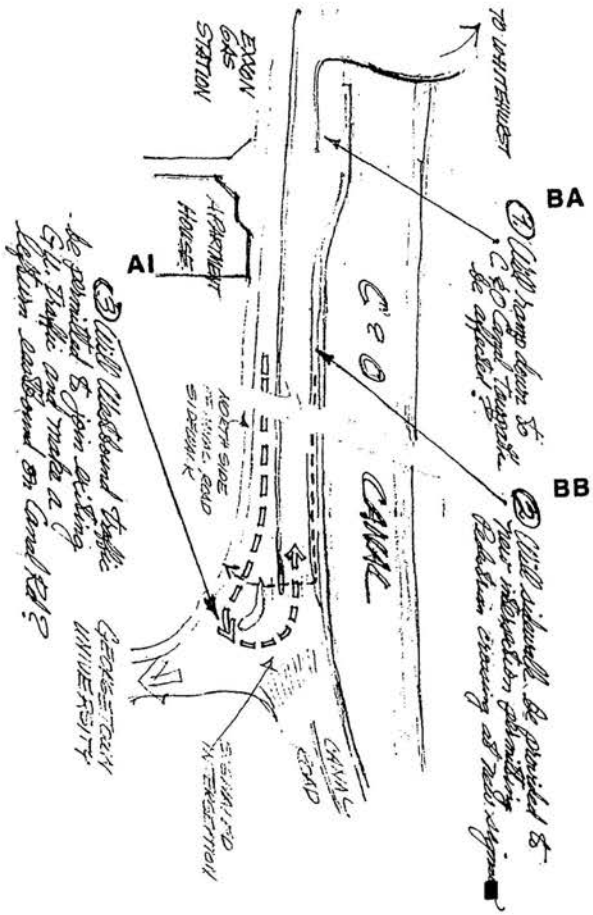
Thank you,

Arthur Cotton Moore

Arthur Cotton Moore



DOCUMENT 59



DOCUMENT 60

Chesapeake & Ohio Canal Association Inc.

A citizens' association concerned with the conservation of the natural and historical environment of the C&O Canal and the Potomac River Basin

September 27, 1995

TESTIMONY FOR THE DRAFT ENVIRONMENTAL IMPACT STATEMENT ON THE CANAL ROAD ENTRANCE TO GEORGETOWN UNIVERSITY

The proposed Canal Road Entrance Improvement for the Georgetown University will have immediate impact on the C&O Canal National Historic Park as a result of its proximity. The Canal is acknowledged to be a prime resource of the Washington Metropolitan area as well as the entire Potomac River Basin. As a result, we feel that any project that adversely impacts the Canal is inappropriate and must be avoided. Since this proposed project happens to be in an area of the Canal that already suffers from intrusions from traffic and previous construction, sensitivity to any degradation becomes that much more important. While we appreciate the need for traffic relief elsewhere, we do not feel that this particular solution would help that much and overload the burden on the Canal unnecessarily.

After reviewing the Draft Environmental Impact Statement (EIS) on this project, we find that it does not adequately state the impacts on the Canal adjacent to Canal Road and that this project would adversely affect the Canal. Therefore, the C&O Canal Association Board, in a unanamous vote taken on September 24, 1995 favors the no build option, Option 1 as the least detrimental to the Canal. B1

The main points are as follows:

1. The Draft Statement does not adequately mention dangers to the Canal structure both from construction as well as possible increased heavy traffic when the project is completed. The Canal wall adjacent to Canal Road is quite fragile and might not withstand any additional stress. We understand that construction could create a danger to existing mains under Canal Road, whose rupture would severely affect the Canal. There will be blasting in any of the build alternatives. There is not only the possibility of increased car traffic but also greatly increased truck traffic, especially if this entrance becomes the main campus entrance. AX2

The Technical Report for the EIS dated June,1995 on page 7, Chapter 2 clearly states that the wall "does not meet current standards and that new loads or changes in existibng loads should be evaluated carefully." Also, in Chapter 4, page 12 of the same report, concrns are voiced about the stability of the soil, the stability of the wall and the drainage are considered to be marginal

and there is an explicit statement that the wall must not be subject to any additional loading. There is clearly some majot concern during construction and seems at variation with the markings of Table 4-6.

3

2. The entire section on noise and air pollution does not mention the levels appropriate for the Canal Park. Some sound levels are listed, but without mention, the Canal seems to be equated with a playground, picnic area or other recreation area, Level B. However, Level A, reserved for lands which serenity and quiet are essential to their character is much more appropriate (page 3-18). While we agree that this section of the Canal does not meet this standard, we do feel that there should be no further worsening of the situation. In this regard, no attention has been paid to the any lengthening of peak impacts which are just as detrimental as the actual peaks. There is also no attention paid to impacts at times other than peak, which can be very important in the utilization of the Canal. Since we feel that the traffic patterns created by this project will have just this effect (see Section 4)we disagree with the Draft Statement.

Q 4

K 5

3. Not only is noise and air pollution a problem, but so is visual pollution. As one approaches the city along the canal, this section is the first place where the city is seen and is the visual entrance to the city. The structures already present act to detract from what would be a magnificent view of the Watergate and any retaining walls or other cuts would be a further detriment. The visual importance of this section is not addressed, even though it would be impacted. Similarly, the possible contribution from construction in the Rider's Trust (see Section 5) would be important and is not mentioned. The drawings presented at the hearing on September 19 for the Rider's Trust showed seventeen four-story town houses that would clearly dominate the hillside. To the extent that this project will facilitate the construction along the Rider's Trust property, the visual impact would be quite large.

We wish to point out that the Canal Park plays a major role in protecting the Potomac Gorge and is a very valuable resource for the Washington Metropolitan Area for both its residents and its visitors. The entire length from Georgetown up to Great Falls is very heavily used and any compromising of its integrity would be quite serious.

I 6

4. The traffic analysis does not adequately address the impacts to the Canal. The analysis is admittedly superficial (page 4-13, where queuing analysis was not used because the levels are already too high). While we admit that the current level of service is at saturation and can not get too much worse, we are concerned that the interference of any additional intersection will serve to increase the duration of peak loads, increasing the impacts along the Canal. There is no mention of duration in the EIS. Also, there is no mention of possible backup lengths in the area as a result of interference with current traffic flows from the presence of another intersection. Even Alternative 2A could lead to longer backups along Canal Road in the morning due to interference as cars slow down to enter a left turn stack and especially if the stack overflows. We agree with commentary at the hearing that a LOS B for Canal Road in the morning is incorrect but and is much worse. Certainly any lengthening of stacked traffic along Canal Road would be a major impact for the Canal no matter where it occurred, since the entire length of Canal Road is adjacent to the Canal.

AB 7

The Canal could be seriously impacted even at off-peak hours, while the beneficiary would be at most 200 vehicles during any peak hour according to the EIS (Figures 4-8 to 4-12). We question the traffic flow relief elsewhere relative to the impacts along the Canal.

BH 8

We are also concerned that the intersection improvement will allow additional development not considered. In particular, the 3.8 million square feet of allowable development could be used as traffic generators. Notwithstanding, the University's denial of any five year intention to use the total capacity, an analysis should take cognisance of any maximum build possibilities, which was not done.

AP 9

In this regard, we are also concerned about the possibility of any build alternative allowing a greater density of truck traffic, which could place an additional strain on the Canal walls. This would be possibly an off-peak impact and is not discussed in the EIS. This concern is especiallly elavant given the remarks in Section 1.

Q 10

5. The Rider's Trust property has the potential to be one of the biggest impacts to the Canal. While it is mentioned quite often in the EIS, nowhere is its significance discussed nor the potential for the development of this property to be influenced by this project. As mentioned previously, the proposed development would have a large visual impact on the Canal, changing a view from an approach to the city and Watergate to one of high development. The dispute as to ownership may have indeed been resolved according to statements made at the hearing, but in any case the property will certainly be developed by somebody if it can be. A dispute in ownership should not be used as a means for not addressing the issues of its potential development. Certainly the drawings presented at the hearing show clearly what visual impact potential construction could have.

While we cannot judge the merit of the statement made by Mr. Bebchick as to the right of the Rider's Trust to have access regardless of the wishes of the Park Service, we are concerned that any improvement could lead to access and development. We feel that this is the more important issue than who will actually own the property.

BL 11

6. Finally, we are concerned by the section 4f exchange of property to compensate for the use of the Park Service property that is needed for any of the build alternatives. A mention is made of a parcel along the western edge of Georgetown University, but the most environmentally sensitive part of the Canal is along the southern edge of the campus. It is not clear that there is any parcel along the western part of the campus that will benefit the Canal.

F. I. Mopsik

Frederick I. Mopsik
Environmental Committee

[illegible]
F Hill
Washington D.C. 20002 -

September 23. 95

Dear Arthur.

A[1] I am writing to offer my support for the Canal Road Alternative 2 project.

My family is affected by this traffic problem more than any other family in Georgetown.

I live with my wife and two small children @ 1310 34th Street (the very heart of the traffic problem) My wifes' family has lived at this address since 1929. We have been in the house since 1987. We have endured the traffic problem for far to long. It needs to change now!. Others need to share the problem.

The largest concern is the children in this densley populated area. My son's lead levels are so high he is monitored by the D.C. government. My daughter is now being tested. The soils are so polluted from car exhaust that we can not have vegtable gardens. We have also had incidents of fish kills in our fresh pond. I have pictures of our Constituencies that had to be replaced because they were encrusted with filth from car exhaust.

Beyond the pollution the traffic also causes a Safety and Crime problem. Sometimes cars are parked in front of the house enabling passers by to "case" the neighborhood. Other times the cars barrel down 34th without regard to the stop signs.

DOCUMENT 61

Also, many drivers are extremely rude not allowing us out of spaces. Shooting the finger. or not speeding even to my wife with a baby carriage.

The city has been of no help. They have refused my request for "children at play" and "Hidden drive" signs. They have also ignored ideas for Speed bumps or smog eating Trees. No one even thinks of spreading the traffic out so that we do not bear the brunt of traffic. My suggestions to keep traffic moving at the Key Bridge were also ignored.

Please help us with this night mare. The traffic cause delays that make a 5 min trip to visit grandma turn into a 35-40 minute trip from Georgetown to Spout Run just across the Key Bridge.

Thanks for your help in this matter.

James O'Hara
[redacted]
Washington Dc 20007

P.S. Property Values and Resale of homes is effect adversely by this huge volume of traffic. It's like living next to I-95.

10/19/95 11:47 ☎202 822 3269 CHUI

DOCUMENT 62

DEPARTMENT OF TRANSPORTATION

95 OCT 26 P1:07

ACTION is assigned to FHWA

ADMINISTRATION

Bonnie Panter
[redacted]
Bethesda, MD 20816

October 19, 1995

Secretary Federico Pena
U.S. Department of Transportation
Washington, DC 20590

Dear Secretary Pena:

AA[1] I am writing you to protest the project on Canal road currently being proposed by Georgetown University. As a daily commuter on MacArthur Boulevard and Canal Road I find this proposal very upsetting.

Currently traffic during morning and afternoon rush hours is extremely slow and congested. The addition of another traffic light on Canal road would further intensify the congestion problem and adversely affect commuters from DC, Maryland and Virginia.

J[2] I think it is wrong to inconvenience thousands of tax paying commuters and surrounding communities for the sole benefit of Georgetown University (a non tax paying institution). Thousands of commuters use these roads on a hourly basis while the University needs this traffic light for their own use (which would benefit only 200 cars). It is obvious where the greater need exists. Georgetown University should be encouraged to reallocate their funds for a more worthwhile purpose which does not disrupt the community and traffic flow.

F[3] Your support is strongly needed in helping prevent this project from being approved. I urge you to help.

Sincerely,

Bonnie Panter

Bonnie Panter

DOCUMENT 63

O'BRIEN KALVIN & ASSOCIATES, INC

MEMORANDUM

To: Senator Barbara Mikulski
Senator Paul Sarbanes
Congresswoman Connie Morella
Congresswoman Eleanor Norton Holmes
Mayor Marion Barry
Council Chair Dave Clark
Councilmember Jack Evans
Transportation Secretary Frederico Pena
FHWA Regional Director Arthur Hill
Interior Secretary Bruce Babbitt
National Parks Director Roger Kennedy
Congressman Tom Davis, Chair House Subcommittee
Senator Bill Cohen, Chair Senate Subcommittee
Harvey B. Gantt, Chair National Capitol Planning Commission

From: Anne O'Brien Peay
President, O'Brien Kalvin & Associates, Inc.
Terry G. Peay
Executive Vice President, The Stephen A. Goldberg Company

Date: 22 January 96

Re: Opposition to the planned traffic light on Canal Road for Georgetown University

---

F[1] Recently, while sitting in traffic at the intersection of Canal Road and MacArthur Blvd., we were given a notice about the planned traffic light on Canal Road for Georgetown University's vanity entrance, to be paid for with our tax dollars. We are writing to you to express our extreme opposition to this proposal.

BF[2] As you may be aware, traffic in this particular area is already extremely congested. We understand that during the two year construction period that traffic would be diverted to Reservoir Road and that Canal Road would be reduced to a one lane road. The resulting gridlock would be unbearable. In addition, we understand that the rock palisade above Canal Road would be blasted and replaced with a retaining wall (eliminating beautiful trees and greenspace) and that this blasting will endanger the C&O Canal as well as the water mains that supply the entire District of Columbia.

AX[3] AK[4] How any official could even think of approving such a project is beyond us, but we felt it important to let you know how opposed we are to this project. We feel that nothing is gained for the community by this vanity entrance, and that the "road" to get there would destroy District residents and commuters in that neighborhood. Our typical commute of 8 miles to work, down MacArthur Blvd., Canal Road, Whitehurst Freeway and K Street NW, currently takes a minimum of 45 minutes. The intersection at MacArthur and Canal Road is backed up for at least one mile every morning, and Whitehurst Freeway is backed up to K Street almost every night. These roads cannot take any more traffic, not to say anything about the destruction of the beauty and serenity of the landscape around the Canal. It is a beautiful entrance into the City - and must be allowed to stay that way. PLEASE DO NOT ALLOW THIS TRAFFIC LIGHT TO BE INSTALLED.

[redacted]
WASHINGTON, DC
2 0 0 0 4
[redacted]

DOCUMENT 64

Susan M. Phillips
[redacted]
Washington, D.C. 20007

September 19, 1995

Mr. Arthur Hill
FHWA, Suite 750
820 First Street, N.E.
Washington, D.C. 20002

Dear Mr. Hill:

I have been told that a decision is going to be made whether or not to open up Canal Road to through traffic.

I am concerned about my son's safety around our home and I am in favor of the project if it will help alleviate the traffic in our neighborhood. Therefore, please count this as one vote "FOR" the Canal Road Project. A1

Sincerely,

Susan M. Phillips

Susan M. Phillips

DOCUMENT 65

FOXHALL COMMUNITY CITIZENS ASSOCIATION
Founded 1928
Colony Hills - Foxhall Village - Indian Rock Terrace

29 September 1995

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

Subject: Canal Road Project

Dear Mr. Hill,

I am the elected President of the Foxhall Community Citizens Association (FCCA). This is a community association of just over 700 households. We are located in the area nestled along Reservoir Road to the north, MacArthur Boulevard to the south, and the Glover Archbold Park to the East. This places us at the confluence of three major intersections which will be seriously, and adversely affected by the Canal road project. These intersections are:

- Reservoir Road and Foxhall Road
- MacArthur Boulevard, Foxhall Road, and 44th Street
- Foxhall Road and Canal Road

The citizens of the FCCA are on record as being against any of the build alternatives. The FCCA is on record as being for alternative 1, the no build option. B1

Our representative commissioners to the Advisory Neighborhood Commission 2E, Mrs. Judith Dollenmayer (ANC2E-01), and Mr. Brian Harrington (ANC2E-02), are also on record as being against any of the build alternatives, and as being on record for alternative 1, the no build option.

The FCCA board of directors and I have found the EIS to be hopelessly inadequate because of the total absence of any discussion of the impact of the Canal road project on the Foxhall Community or the clear need for this project at all. The Canal Road Project is so hopelessly narrow in focus that it's intent to help a single, private organization to the detriment of surrounding communities is glaring. BV2

Since I have been following the dealings of a private university with a history of building expansionism and dubious for profit schemes with negative impact on surrounding communities (i.e. Marriott operated hotel, Dominion Energy), I have serious reservations about the true requirement for the Canal Road Project. Please note that the lawsuits from the G.U./Dominion power plant, with charges of filing of false and misleading government permit applications and the submission of false and misleading documents in regulatory proceedings, are still ongoing. CA 3

Georgetown University in its current building plan envisions 3.8 million square feet of new buildings, 3.5 million square feet to be non-academic. This can only be interpreted as commercial development. Commercial development (leased for profit with tax free exempt status) of any scale could not be accomplished unless access can be provided. Is this the real reason this Canal project is being pursued? Despite the answer to this question, the EIS does not account for any of the traffic which would come from this planned development. W 4

The end result of any build option for the Canal road project is additional traffic on the streets of our neighborhood, with no real mitigation from traffic on the streets of Georgetown. The only clear winner in any build scenario is Georgetown University, a private, tax free entity. BF 5

As stated in the EIS (1.3.2), one of the District's goals is to reduce traffic volume through residential streets. This discussion, although referring to Georgetown, applies the same argument to the streets of Foxhall. Again, please note that the EIS does not study the effects of traffic in our community. It is also mentioned (1.3.1 Project Objective - Improve Roadway Utilization) that Canal Road is an east west commuter route for traffic for residential areas in northwest D.C., Virginia, and Maryland and the District's office centers, and that this traffic is best served by arterial roadways and not local roads which serve residential traffic. AB 6

What I currently observe as a long term resident at 1612 44th Street NW, is that we have cars from Virginia and Maryland going east on P, Q, Volta, Greenwich Parkway, and the alleys of Foxhall Village to go north or south on 44th street in order to bypass traffic at the intersection of Foxhall and Reservoir, or Foxhall and MacArthur. The reason, as simply stated by the D.C. Metropolitan police, is that the intersections mentioned are already clogged beyond capacity and that drivers will take any route, even through residential streets, to avoid this traffic back-up. This is contrary to the project objective of keeping higher levels of traffic on arterial roads and off the residential streets. I will also mention that these drivers travel at great speeds through our residential streets and create a serious hazard to the safety of the children and adults of this community.

The Canal road project will create an even larger backlog of traffic at the intersections of Reservoir Road and Foxhall Road, MacArthur Boulevard and Foxhall Road and 44th Street, and Foxhall Road and Canal Road. The end result will have a far greater impact on our residential roads. AD 7

As mentioned earlier, the Canal road project is hopelessly narrow in scope. It is designed is to serve a single end user, without consideration of the surrounding communities or commuters from Northern Virginia or Maryland. There are serious traffic problems in this region and the Canal road project doesn't address them. The money for the Canal road project would have been much better spent solving a regional problem instead of solving a problem for Georgetown University. J 8

Respectfully submitted,

Scott Polk, President
Foxhall Community Citizens Association

Burleith CITIZENS ASSOCIATION

Washington, DC 20007

Executive Board
Peter Pulsifer,
President
Lee Gravatte
Steven Fessler
Bonnie Hardy
Treasurer
Lynne Hartshorn
Recording Secretary
Ann Gallagher
Corresponding Secretary
David Conner
Past President
Guy Gwynne
Newsletter Editor
Virginia Warren
Henry Meyer
Margaret Kostic
Margaret Meenahan
Richard Reed
Ted Jacobs

BURLEITH CITIZENS ASSOCIATION POSITION ON THE CANAL ROAD ENTRANCE PROPOSALS

Burleith is an entirely residential neighborhood of about 500 households, located directly north of Georgetown University. Burleith is bounded by Reservoir Rd on the south, Whitehaven Parkway on the north, 35th St on the east and 39th St on the west.

The citizens of Burleith, like the citizens of Georgetown, suffer a significant impact from traffic connected with the day-to-day operations of Georgetown University. Of the five full (two-way), traffic access points to the University, four, on Reservoir Rd., are directly connected with Burleith. These entrances serve 2,157 Medical Center parking spaces, plus business and visitor traffic. The other full entrance is that on Prospect St, which serves some 1,451 parking spaces.

Impact on Burleith from University traffic includes severe congestion on 37th St and Reservoir Rd, including a large number of heavy vehicles and service vehicles. Congestion on these arterial roads encourages dangerous high-speed through traffic to cut through the community. Parking problems also exist, possibly exacerbated by the fact that the Reservoir Rd entrances are the most prominent and easily accessible routes to the University.

AW[1] It is unfortunate that the draft EIS did not address the issue of University-related traffic on Reservoir Rd and through our community. The stated reason for this was the existing gates that prevent passage between north and south campus. These gates do permit some through traffic, however, and ominous suggestions have been made to modify their configuration so as to put still more traffic on Reservoir Rd. Despite this shortcoming in the draft EIS, we do feel that we can take a position on the current proposals.

At its regular meeting on September 13, 1995, the Burleith Citizens Association considered the proposed project. The following resolution was passed.

E[2] **Resolved**, that the Burleith Citizens Association opposes Alternatives 1, 2, 3B and 3H, and supports Alternative 2A (traffic light at grade with Prospect Street open), under the following two conditions. 1) No further property development must occur as a result of this project; 2) As stipulated in Alternative 2A, the Prospect St entrance must remain open.

P[3] We are opposed to any further development resulting from this project. In particular, any development of the Riders Fund property would be unacceptable. Additionally, our support of this alternative is based on the understanding that it will not enable any further on-campus development.

G[4] We are opposed to closing the Prospect St entrance. Closing it would block access from the nearby neighborhood and downtown DC to the University. DC residents with business or jobs at the University would be forced to go through the Key Bridge bottleneck or to circle around the University on Foxhall and Reservoir Roads, passing through several residential communities, including Burleith. We

believe that projects like this one should encourage, not discourage, DC residency by University employees.

AA[5] One additional neighborhood concern is disruption during the construction process. It is very important that through traffic be allowed on Canal Rd during construction, and that traffic disruption be minimized.

We believe that improvement of the Canal Rd entrance will lead to improved conditions in impacted neighborhoods like Burleith by providing an entrance on an arterial road as an alternative to those that presently exist on Reservoir Rd. While no direct improvement is promised in the current plans, we hope that this development may enable future reduction in use of the Reservoir Rd entrances.

BE[6] Finally, it must be noted that improvement of the Canal Rd entrance must be supplemented by improvements in both physical equipment and traffic management, particularly on Canal Rd, Key Bridge, and the Whitehurst Freeway. While a large contributor, Georgetown University is not the only cause of the traffic problems afflicting this area, and many problems will remain even if this project is completed.

Peter Pulsifer
President,
Burleith Citizens Association

Washington
8/29/95

Mr Arthur Hill
FHWA, Suite 750
820 First Street, N.E.
Washington, D C 20002

Dear Mr Hill

A1 For the reasons expressed in the enclosed flyer, I support, and encourage you to support, the "Canal Road - Alternative 2" option.

Thank you.

Best Regards

DR. MATTEO RECAGNI
[redacted]
WASHINGTON, D C. 20007

Matteo Recagni

Government of the District of Columbia
Advisory Neighborhood Commission 2-E

WE CAN STOP DAILY GRIDLOCK IN THE 34TH ST. CORRIDOR

Dear Neighbor:

Have you ever wondered why the residential streets near Georgetown University are jammed with cars during the morning and evening rush hours? This is because 4,300 cars enter and leave the campus each day via Prospect Street, a residential street designed for only local traffic. Few cars use the University's main entrance on Canal Road, an arterial street engineered to handle commuter traffic. University commuters cannot use Canal Road because a concrete raised median barrier prevents traffic from turning left into and out of the campus.

During the month of September 1995, we have a once-in-a-lifetime opportunity to remedy this. The Federal Highway Administration (FHWA) is proposing a fully-Federally funded modification to Canal Road that will enable University traffic to enter and leave the campus from all directions. To encourage commuters to use Canal Road instead of our local streets, Georgetown University has agreed to close its Prospect Street entrance to all traffic except emergency and maintenance vehicles when Canal Road is modified.

The Canal Road project will radically improve traffic conditions in Georgetown, will have only a minor impact on traffic conditions elsewhere, and will have no negative environmental effects. The FHWA has determined that two of the three proposed alternatives being considered (overpass and underpass) will add only 6-10 seconds to Canal Road commuters' daily trips. The third alternative--an at-grade intersection with a traffic signal--will add only 10-15 seconds. **Alternative 2, the at-grade intersection, is the least costly ($1.7 million), will have the least visual impact, and will cause minimal interim disruption. It is the most cost-effective choice.**

Unfortunately, some communities to the north and west of Georgetown have organized to oppose any change to Canal Road, regardless of the great relief this project will bring to our community and the insignificant effect it will have on them. Because of this opposition, the FHWA will not improve Canal Road unless Georgetowners strongly support the project.

Show your support for Canal Road, Alternative 2:

1. Call your ANC Commissioner before Sept. 5 and ask her to support the Canal Road project.
   Waterfront to south side of N St: Jonda McFarlane - 965-3131
   North side of N St. to south side of Volta Pl.: Beverly Jost - 625-7447
   South side of Volta Pl. to Whitehaven Pkwy: Westy Byrd - 342-3916
2. Attend the Sept. 5 ANC Meeting, 7:30 p. m. at St. John's Church, Potomac and O Sts. N.W.
3. Attend the Sept. 19 FHWA Hearing, 6:00 p.m. at the Mt.Vernon College library.
4. Write to the FHWA by Sept. 30:
   Mr. Arthur Hill
   FHWA, Suite 750
   820 First Street, N.E.
   Washington, D.C. 20002

If we all make a little effort now we can solve our traffic problems for years to come.

Sincerely yours,

Jonda McFarlane
ANC 2E-06

DOCUMENT 67

Once in a great while a proj[illegible] comes along that all Georgetowners can agree on. Once in an even greater while, that project involves a local transportation improvement. The Federal Highway Administration's (FHWA) proposed modification of Canal Road near Georgetown University's south entrance is such a project. It deserves the community's strong and active support.

Transportation improvement projects in Georgetown have often been controversial: Metrorail; the Whitehurst Freeway, "Stop" signs or traffic lights on P Street. Most such proposals divide the community because the are perceived as shifting one area's traffic problems to another. Not so with the Canal Road project.

For nearly two decades, the FHWA, in cooperation with the D.C. Department of Public Works, has been trying to find a way to provide the nearly 5,000 vehicles that enter and leave Georgetown University via Prospect Street, N.W. with a more direct route to and from the University that does not require them to thread their way through Georgetown's narrow residential streets. The FHWA is involved in solving this traffic problem because Canal Road is categorized as a "principal arterial" commuter route that links downtown Washington with the northwest suburbs, Maryland, and Virginia.

In 1982, the FHWA concluded that the remedy for the daily gridlock caused by University traffic in Georgetown was the installation of an additional traffic light on Canal Road near the University's south entrance to permit vehicles to make left turns into and out of the campus. But, the FHWA shelved its plan in the face of opposition from individuals concerned that an additional traffic light would delay through traffic on Canal Road.

By 1987, with daily traffic on the west side of Georgetown stalled during the evening rush-hour as far north as P Street and beyond, FHWA analysts decided to revisit the Canal Road situation. They are now considering four possible proposals for solving this daily traffic nightmare. The four alternatives are: construction of an overpass; construction of an underpass; and two "traffic light" alternatives, one which would permit left turns into and out of the University's south entrance at all times, and one that would make no change in current Canal Road traffic patterns during morning rush-hour but would permit left turns at Canal Road in both directions at all other times.

The first three alternatives would involve the closing of the Prospect Street entrance to the University to all but emergency and University maintenance vehicles. The fourth would keep the Prospect Street entrance open, but traffic using Prospect Street would be substantially reduced because of the availability of a more direct route via the University's south entrance and the new Canal Road traffic signal.

AUGUST 1995 . .

The FHWA has [illegible] issued a [illegible] Environmental Impact Statement evaluating the impact of the four "build" alternatives, and also the impact of not making any changes to the current conditions. The Draft EIS concludes that none of the four "build" alternatives will negatively impact the environment, and that any of the four will improve the traffic situation on Georgetown's residential streets near the University.

Long before the FHWA completed its most recent study of the Canal Road situation, some individuals and community groups in the Palisades, the Foxhall/MacArthur neighborhoods, and as far north as Potomac, Maryland, staked out a position against any modification to Canal Road. They claim that shifting traffic from Georgetown's residential streets to Canal Road will delay their daily commute to and from downtown.

We hope that these premature opponents of the Canal Road project will read the Draft EIS with an open mind. If they do, they will see that their worst fears are unfounded. FHWA analysts have concluded that the proposed traffic signal will delay commuters' Canal Road trips by only 10-15 seconds, while the overpass and underpass alternatives would cause only a 6-10 second delay per trip. Surely, even the most time-sensitive commuters must have 10 or 15 seconds to spare in their daily routines.

Unfortunately, Georgetowners cannot sit back and assume that because FHWA's conclusions on the Canal Road project are so favorable, the Canal Road project will be easily approved. (Lest we not forget that Georgetown University's Cogenerator sailed through scores of agency technical reviews, only to crash on the rocks of local politics.)

Georgetowners have everything to gain from improvements to Canal Road. Although neighboring communities have only a few seconds a day to lose, Federal and local decisionmakers may still be swayed by Canal Road opponents. It has happened before, and it can happen again. This time, Georgetown's united support for the Canal Road project must be loud and clear.

It is too soon to tell which of the four Canal Road build alternatives is best. However, with a pricetag of $1.7 million, compared with $11.3 million and $20.2 million respectively for the overpass and underpass, either of the traffic signal alternatives seem to be more reasonable choices.

For now, the FHWA needs only to hear that Georgetown wants and needs relief from University-related traffic that is clogging its streets, polluting its air, and making a large part of the community inaccessible several hours each day.

Send a letter to the FHWA (Mr. Arthur Hill, FHWA, 820 First Street, N.E., Suite 750, Washington, D.C. 20002) expressing your support for the Canal Road project. Attend the FHWA public hearing on the Canal Road project which will be held at 6:00 p.m. on September 19, 1995 at the library at Mount Vernon College.

If Georgetowners decide to sit this one out, we will have only ourselves to blame.

DOCUMENT 68

19 September, 1995

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:

F[1] We wish to express our opposition to all plans to change the Canal Road entrance to Georgetown University. We find that many serious questions have been answered unsatisfactorily, if at all. Below are some of our concerns.

BF[2] 1- Traffic: of course, we understand that people living on several streets east of the university greatly desire reduced traffic, but so does everyone living close to the center of a large city. Shifting traffic from one area to another surely is not a real solution to any problem. Anyone using or observing Foxhall, Macarthur, or Canal Road in the morning! rush hour knows how heavy the traffic already and how often there are back-ups. Traffic would become heavier under any of the 4 proposals, even though some are worse than others.

J[3] 2- Costs: any change would be paid for by us, the taxpayers. Is this the best use of tax revenues, given the dreadful condition of D.C.'s roads and budget? Changes in Canal Road seem like an unconscionable waste of money.

V, X[4] 3- We understand that the university wishes to construct 2 commercial buildings on the edge of the park, not far from our houses. This seems to have many horrifying implications. We often hear heavy construction noises during the night. We assume that these would increase and continue for months, perhaps years. We have many questions about the environmental impacts of such development on the park and neighbourhood. We are aware that the university has an unusually small endowment. As an increasingly prominent institution, why does it not conduct better fund-raising and capital campaigns, instead of proposing new projects every few years that are disruptive of surrounding neighbourhoods?

P[5] 4- The Riders' Trust: what is it? Who owns or controls it? What is those people's connection with the university? Who would most profit from building 40 houses? There are many additional questions to be answered about this subject.

We hope that all proposals will be rejected once and for all, but, if that does not occur now, we would greatly appreciate much more thorough and accurate information about the above matters.

Thank you.

DOCUMENT 68

Sincerely,

Anne H. Reese

[redacted]

Paul and Jane Pfeiffer

[redacted]

FROM FROM 202-785-9423 (TUE) 10

DOCUMENT 69

October 24, 1995

Arthur Hill
FHWA Regional Director
Fax: (202) 523-0181

Dear Mr. Hill:

F 1 J 2 As residents of the District of Columbia, we would like to register our strong disapproval of the proposed traffic light on Canal Rd. It is unreasonable for the Federal Highway Administration to add a light for the convenience of Georgetown University students (who are part-time residents) at the expense of tax paying D.C. residents who will be subjected to longer traffic commutes in the morning and at night.

We urge you to NOT go forward with the proposed project.

Sincerely,

Kenneth B. Reisenfeld

Hayes M. Reisenfeld

523-0181

10/25/95 09:04 ☎202 366 8712 FHA

DOCUMENT 70

Georgetown University has been pushing for a new intersection on Canal Road, even though the new traffic light would create daily traffic jams from Canal to the District line.

BG[1] I attended community meetings at which it was optimistically estimated that the new traffic signal would add 30 minutes each way to my commute. At these meetings a Ms. Greenan from Georgetown U. repeatedly argued that the new intersection would help relieve congestion at the corner of 34th and Prospect. She says that the University gets complaints from the people who live at 34th and Prospect. Doesn't she know that there are many more people who don't live at 34th and Prospect than who do? It's unfair for the hundreds or thousands of people who commute to have to sit for an extra hour each day so that there will be less traffic on 34th street.

The transportation officials admit that they have not studied the impact of the new intersection on MacArthur Blvd. traffic. In their own studies, they state that traffic on Foxhall and Canal is bad.

Think of the gas that will be wasted by all those cars stalled in this new traffic jam. Think of all the human energy this intersection is going to waste. The construction will cost millions of dollars that could be used elsewhere.

CI[2] At these community meetings, GU shows that they are a bad neighbor. They misrepresented the size, purpose, and function of their proposed power plant. They lied about basic facts. In the case of this intersection, they said years ago that they had Congressional approval to build and intersection, when there was no such approval. At various times they said that an underpass would be built, when it seems obvious that they are planning and "at grade" crossing that would create a bigger traffic jam.

I called the University at the time this was proposed and was told, "do you know how many members of Congress attended Georgetown?" How arrogant! Do they mean to say that members of Congress attended the university and will automatically approve anything the university proposes, even if it's a bad idea?

C, AX[3] This intersection is a bad idea that will ruin the area near the C. & O. Canal. It will only
J[4] benefit Georgetown University and a small minority of affluent people in Georgetown at the expense of thousands of working people.

F[5] Please help. Stop the Federal Highway Administration from building this permanent monument to poor judgment.

Maurice Sanders
[redacted]

DOCUMENT 71

MICHAEL G. SCHEININGER
[redacted]
Washington, DC 20005

October 24, 1995

Mr. Arthur Hill
Regional Director
Federal Highway Administration
820 1st Street, NE, Suite 750
Washington, DC 20002

Re: Canal Road Commute

Dear Mr. Hill:

I am a Maryland resident who has commuted every day for the past 15 years into downtown DC. Over the years, my commuting time has grown longer and longer. At rush hour, it now takes me 40-45 minutes to traverse the 13 miles from my house to my office. My primary route of travel is the Carter Baron Parkway to Canal Road to the Whitehurst Freeway.

I have just learned that Georgetown University wants the Federal Highway Administration to add a traffic light on Canal Road so as to facilitate University personnel access to Key Bridge. I also understand that GU wants to construct additional lanes for its own use on Canal Road.

BF[1] The prospect of construction delays followed by a permanent lengthening of my already wretched commute is enough to motivate this, my first letter ever on the issue of my commuting.

F[2] As a tax payer, an area commuter, and an adjunct professor of law at GU, I ask for your unqualified opposition to this plan by Georgetown University.

Sincerely,

Michael G. Scheininger

MGS/flh

DOCUMENT 72

Joju Sebastian
Mini Sebastian
[redacted]
Gaithersburg MD 20877

Ref: Georgetown University's request to add a traffic light on Canal Road

We read about the request and are really stunt. How it takes about 15-20 minutes to travel between Reservoir Road and Canal Road intersection to Canal Road and Fox Hall Road. Adding another traffic light anywhere on the Canal Road or Fox Hall is a real slap on the commuters face. A decision in favor to the University is really going to hurt the daily commuters. We humbly beg you not to add another light in this route. Please take the long haul commuters like us in to consideration before you decide. Also, we hear a lot about saving the environment and nature's beauty. Is that what really University has in mind ? I very much doubt that. Please do not add any more lights on the Canal Road !!!

BF 1
AC 2
F 3

DOCUMENT 73

RICK SHERMAN
[redacted]
WASHINGTON, D.C. 20007
U.S.A.

Arthur Hill
FHWA
820 First St. NE #750
Washington, DC 20002

Dear Mr. Hill:

I write to you concerning the C□nal Road project designed to relieve my neighborhood of the burden of heavy traffic from the university twice each day.

A 1 I fully support the efforts of those who have designed alternative egress from the university parking lots and support your agency's approving the plans. Georgetown is truly burdened with these thousands of cars on 34th St. and 35th St. (not to mention the cross streets) all maneuvering for advantage in the rush to escape the District each evening.

I have attended meetings on the project but am not sure I will be at the next one on Sept. 19th. I wanted, therefore, to write to you about my support for the proposal.

Thank you for your hard work on this plan and, please, carry through now to achieve the outcome I and my neighbors, as well as the commuters, desire.

Sincerely,

Rick Sherman

DOCUMENT 74

W. KENT SLOWINSKI LANDSCAPE ARCHITECTS
[redacted] WASHINGTON, DC 20007 202-338-9534

September 27, 1995

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

Re: Georgetown University South Entrance (Canal Road) Project

Dear Sir:

BV 1 I am concerned about the incomplete, misleading and false information presented in the Draft EIS for the Georgetown University South Entrance Project. I believe the focus of the study was too narrow and does not address neighborhood or regional traffic problems.

Foxhall, MacArthur and Canal Roads eastbound are major morning commuter routes. Whitehurst Freeway and Canal Road westbound are major evening commuter routes. I prefer to cut through 33rd, 34th and 35th Streets, instead of sitting in traffic on Foxhall, Reservoir, Canal, Whitehurst or Key Bridge. Commuters and neighbors frequently sit through 3-6 signal changes at these intersections, yet some intersections are only rated LOS B. Other intersections are rated LOS F.

BF, W 2

BH 3 These intersections will be impacted by traffic diverted from Prospect Street, future development of the Riders' Tract, and future development of Georgetown University. The Riders' Tract is slated for 17-40 townhouses, and the Georgetown University Masterplan allows for 3,800,000 additional square feet. The EIS does not address traffic generated by the inevitable proposed development.

S 4 I think the scope of your study should be increased to look at these traffic issues on a regional level. In addition, Georgetown University should improve internal traffic patterns so that traffic disperses more efficiently onto city streets.

Sincerely,

W. Kent Slowinski

DOCUMENT 75

10/6/95

Lt. Edward L. Smith
Truck Company 5
[redacted]
Washington, DC 20007
[redacted]

Attn: Ms. Linda Greenan
201 A Healy 37th & O Streets, N.W.
Washington, DC 20057

Dear Linda Greenan:

As per our conversation regarding the impact on the Fire Department if a new intersection was constructed on Canal road. It would be beneficial to the Fire Department if this intersection was located at the base of the roadway that serves the southwestern end of the campus and parking area.

Our Fire Station which is located at 4811 MacArthur Blvd. is comprised of Engine Company 29 and Truck Company 5. These two Fire Companies respond to emergencies on Georgetown University campus. If the location of the emergency is in the southwestern area of campus we now must respond up Reservoir Road and through the entrance at 37th Street in order to reach the emergency. This is a very circuitous route and consequently time consuming. In a emergency situation, time is a very important commodity. Our response time is now negatively effected because of the present roadway situation of small winding roadways and large amounts of pedestrian traffic. The proposed intersection on canal road would be beneficial. Our response time (the time it takes our personnel and equipment to arrive on the scene) would improve, as well as traffic and pedestrian safety.

CJ 1

If this proposed roadway change was to occur the southwestern area of Georgetown University would be more efficiently served by the Fire Department. This area of the campus has a high concentration of dormitories (especially high rises). The heating and cooling plant, McDonough Gymnasium, Yates Field House and the Observatory, etc. are all located on this southwestern area of the campus. This area would become more accessible to Fire Department equipment and personnel if this roadway change was in effect. It is my contention, that the safety and well being of the students, faculty, administrative staff, and others on the Georgetown University campus would benefit from the proposed roadway change.

Sincerely,

Edward L. Smith

Edward L. Smith, Lieutenant

DOCUMENT 76

September 22, 1995

Mr. Arthur Hill
FHWA, Suite 750
820 First Street, N.E.
Washington, D.C. 20002

Dear Mr. Hill:

We think it is fair to say, that for much of the day - and night - seven days a week, traffic on Prospect Street, NW, is extremely heavy. However, especially in the time period between roughly 3:30 and 7:00 PM, the congestion becomes unbearable. The principle reason for this is the enormous number (nearly 5000) of vehicles leaving the Georgetown University campus, and combining with the rush-hour traffic on 34th Street.

We have lived on Prospect Street for nearly a quarter of a century, and have watched the problem steadily grow worse. Every evening we encounter a daunting gridlock, which inevitably makes the time expended traversing the two block distance to our house (between 33rd and 35th Street), equal to the time it has taken us to travel from 6th Street and Constitution Avenue, NW, where we work.

In addition, vehicles of a size and type completely unsuited to residential streets use Prospect Street - often it is the only way they can reach the campus to make deliveries. The street is not engineered to support vehicles of such tonnage and in such quantities. They emit diesel fumes, are extremely noisy, and cause dangerous vibrations. Canal Road is already engineered to carry this type of traffic.

We understand that residents in communities to the north and west are objecting to the proposed modifications to Canal Road. Surely, such modifications would not delay their commute more than a few minutes. Obviously adjustments could be made to the timing of traffic lights depending on the traffic patterns. I cannot believe that the objections of people to a theoretical situation will be given more weight than to those of us who have suffered under the present conditions for so long. We understand that an environmental impact study is not necessary for these modifications. What about an environmental impact study of the traffic situation as it exists now at Prospect and 34th Streets? I am sure you would find that pollution and noise levels were at unhealthy limits. Frustrated motorists are dangerous to the many pedestrians, as well.

H 1
BI 2

As tax-payers, home-owners, and long-time residents of Prospect Street, we strongly endorse and support the proposed modifications to Canal Road - Alternative 2 - the at-grade intersection with a traffic light. Please give this letter your serious consideration.

D 3

Frances P. Smyth and Gaillard F. Ravenel
[redacted], Washington, D.C. 20007

DOCUMENT 77

DR. THOMAS STAUFFER
[redacted]
WASHINGTON, D.C. 20007

September 28, 1995

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

re: Canal Road project

Dear Mr. Hill:

Enclosed please find my formal submission in response to the issues raised in connexion with this project.

I ask that I be allowed to submit the remaining exhibits next week and that they be included with my submission for the record.

I protest the timing of the issue of the EIS and the time allowed for the response. It arrived at the end of the summer, when there is a high probability that citizens and neighbors will be away -- or just returning and preoccupied with getting their children back to school.

It appeared that the timing was calculated to maximize the difficulty of citizen response and minimize the likelihood of citizen participation.

Yours sincerely,

Thomas R. Stauffer

Tel. [redacted]
Fax: [redacted]

Telex: 4991092
TRSTAUFF

1. **Absence of substantive review of alternatives to project**[1]

There is no substantive review of alternative solutions to the traffic problems. In particular options which are energy-efficient and pollution-reducing, such as satellite parking or a satellite campus are conspicuously absent.

Note: the matter is not new. The question had been raised in writing, well in advance of the preparation of the current draft of the EIS.

Note: DOT staff were aware of the issue. Staff had noted this matter, also well in advance of submission of the EIS (see FOIA File "A")..

DOT/HDR cannot claim that this option for remission had not been noticed.

Specifically, where are analyses of:

1. Shuttle buses/satellite parking

U[1] Alternatives to be studied must include shuttle buses/satellite parking. This is a recognized option.

Why was this option not considered with respect to: 1) traffic reduction and 2) pollution abatement?

2. Reduction/elimination of non-conforming traffic

U[2] The EIS does not quantify the traffic on campus now generated by non-conforming activities.

1 As required by statute.

It is silent as to how much traffic could be reduced by eliminating those activities and the associated vehicular traffic.

3. Rescheduling of University traffic

BY[3] Alternatives should include restriction/prohibition of commercial traffic and deliveries to the campus during hours of peak traffic or daylight hours in general.

Example: DOT failed to note GU's own testimony in power plant case about the volume of traffic to be saved if the coal trucks were eliminated.

How much would traffic be reduced if coal deliveries were suspended completely, thereby collaterally bringing the plant into compliance with the clean air standards? (see #9, below).

Is that coal traffic in fact legal? Is it not a violation of the federal regulations that coal is still burned?

More generally, how much would congestion be reduced if all deliveries were restricted to off-hours?

If that is claimed to be expensive, what are the costs of such mitigation versus the alleged gains from the proposed project?

NOTE: it is argued that GU traffic responsible for congestion east of campus. If true, then GU must mitigate. If not true, then argument for Canal Road's impact of Georgetown is false.

AQ[4] Where is the traffic study which analyzes the pattern of traffic to and from the Campus which impacts upon

Prospect street? What is the foundation for any conclusion that traffic on Prospect street would be improved by the project?

AB[5] Traffic studies must be completed which deal with the entire pattern of flow to, from, and around GU, including the interaction with the Whitehurst Freeway and Key Bridge traffic. The omission is glaring.

4. Review of alternatives must assess the costs if the developer claims that alternatives would be burdensome.

In particular, for any such alternative -- as satellite parking and shuttle buses, for example -- the review of alternatives should relate the private costs to the developer of the alternative to the public costs of the project. Note that GU exists "by exception" on its present campus (see Section 4, below).

There is no basis whatsoever in the report for the conclusion of p2-2 that traffic management options would "not serve as an alternative". That key conclusion is unsupported by analysis of alternatives.

BQ[6] Action required: the revised EIS must include substantive assessment of the costs and benefits of all alternatives, noting the impacts on environmental impacts as well as financial costs to both private parties and the public.

The current document is conspicuously derelict.

2 **Egregious failure in traffic analysis:**

DOT noted awareness of new construction of 2.7 mm sq feet (really 3.8 mn) but included NO assessment of associated traffic.

The response by DOT was disingenuous to the point of deception: it stated that the Campus Plan limits cars. How to explain access for 10-13,000 new occupants?

DOT later noted the corrected scale of planned construction; it also noted that GU stated that it had intention to add faculty or students. The EIS was implausibly silent as to number of occupants in structures included in Campus Plan and the associated new traffic.

Traffic analysis must take Campus Plan as given (or recognize its fatal flaws; see section 3 on "Pattern and practice of bad faith).

Mr. Waggoner (spelling), new VP of GU, stated orally that GU did not plan substantial further building. Such a statement is not binding; that assertion can be given weight if and only if the commitment is in writing and if GU so notifies the BZA of an amendment to the Plan.

BH[7] If DOT/HDR do not provide analysis of the expansion-related traffic, and if DOT/HDR do rely upon any claimed limitation to the construction plans, then DOT/HDR shall provide copies of written declarations by GU that construction will be limited and also of the related filing before the BZA.

3. **Documented history of oil spills on campus, including leakage into the Potomac** (see Exh TRS-8).

BS[8] Why is that history of contamination not discussed in the EIS?

Where are the soil surveys?

Where is remediation discussed?

BT[9] Has the Park Service responded to the possible contamination of its lands in and around Archbold Glover Park?

If not, has DOT obtained from the Park Service the records of the several spills and any consequential soil surveys?

4. **Special Status of Georgetown University: Subordinated "Rights" because exists and operates only by exception and in absence of "adverse impact".**

DOT memos raised the question whether GU has any "right" to access. The zoning documents emphasize that GU activities are limited to those which have NO adverse impact.

DOT should show that the proposed plan meets the standard/test imposed by the zoning regulations.

Y 10 Given the public opposition, how can DOT conclude that there is "no adverse impact"? Citations to be supplied if this is disputed.

5. **Status of Land**

A. Project promotes development of housing and commercial office projects

It is our understanding that the National Park Service may not exchange land which would have the effect or purpose to facilitate commercial developments.

P 11 Can DOT show that the project will not facilitate directly at least two possible commercial developments?

1. Tract of townhouses (Riders Trust property)

DOT knew of impediment.
EIS is silent.

Money is wasted unless this issue had been resolved first.

Project provides access to currently undeveloped tract abutting NPS lands.

Mr. Gordon, attorney for the Trust, clearly stated in the public hearing that the Trust would be able to build if the access road were provided.

DOCUMENT 77

2. Commercial development of campus

V 12 The project facilitates the planned commercial expansion of GU's campus by providing indispensable access for commercial developments on GU campus.

Planned office buildings are unrentable without expanded access for vehicles.

The project is therefore a key step in promoting that development.

DOT knows of this plan; the EIS is silent (see FOIA File "A").

NPS, as well as DOT, must also consider information in files about intent and impact on commercial development and recent history of such development on campus; see Section 9).

- DOT files show that DOT suspected or knew that the project is designed to give access to the planned commercial development on campus (FOIA File "A").
- GU documents/statements acknowledged that purpose is to support commercial expansion on campus (see FOIA File "A").
- DOT is aware of precedents for commercial projects on the Campus – staff memos note "illegal hotel" already operating on the GU campus (FOIA File "A").
- GU documents clearly show that some 3.4-3.5 mn square feet of the added space are not for academic or

hospital purposes.

How is the land transfer possible if this restriction is binding?

How is the current expenditure justifiable if that restriction has not been resolved?

B. Reduced quid pro quo

GU had agreed to offer 6.5 acres of scenic easement in return for NPS land (FOIA File "A")..

Suddenly NPS is willing to consider taking only 2.4 (?) acres.

P 13 | Where is the documentation for the change in conditions? Was this change legal? Is that consistent with the requirement that GU fund a fixed share of the costs?

N 14 | C. Value of scenic easement

Where is the appraisal of the easement?

Where is it shown that it is sufficient to cover GU's share of the project, or expenditure to date?

Where is there a ruling on the developability of that land for which the easement is offered? If it cannot be shown that the land can be developed, how can it be concluded that the "easement" has value?

If the easement does not have demonstrable value, how can DOT justify spending funds when the counterpart quid pro quo has not been ensured?

Why should all work not stop until the status of the land exchange has been resolved?

Is it correct that the design work will have been wasted, and the public funds

spent to no avail, if it is ultimately determined that the land cannot be exchanged?

Is it not prudent to defer irreversible expenditures until an issue on the critical path is resolved?

L 15 | D. Proposed purchase of land

A DOT representative at the public hearing stated that "we" (presumably referring to an agency of the USG) might purchase the land, thereby facilitating any transfer.

Is this an option being reviewed?

How can such land be purchased under a demonstration project?

How can it be demonstrated that any such purchase is necessary for the construction of work on the Federal highway, as distinct from an access road to GU?

6. **Environmental Impacts**

The selective detail highlights the critical importance of what has been omitted from consideration.

BY 16 | Conspicuously absent is review of the environmental gains from the satellite parking/bus option:

What are the reductions in pollution levels with different levels of shuttle bus operations?

What is the cost-effectiveness of this option for reducing pollution?

What is the reduction in pollution if non-conforming traffic is eliminated? (see #9.b below).

How do these options together compare with the claimed amelioration from the project?

GU acknowledges concerns for public health impacts of congestion (Hearing Transcript).

That is therefore an even stronger argument for reduction of own traffic as first step towards environmental remediation.

7. **Large-scale Commercial Development Plans on Campus Excluded from Analysis**

CA 17

The planned commercial expansion of the campus is clear from DOT memos, as well as from material from GU obtained through FOIA.

GU has already undertaken, or attempted, such commercial activities; see also Section <>False data on space to be added. That history must be reviewed with respect to two aspects of the current project:

- Pattern and practice of duplicitous information (see Section 12). Given that history it is particularly important that the plans be reviewed with due diligence.
- Need to review existing and prospective development plans, or provisions for such development, in current review of traffic effects – i.e. considerable mitigation could be possible through the simple device of curtailing non-conforming traffic related to existing commercial operations.

  The latter include, but are not limited to, the Marriott-run hotel, longer-term rental of space on campus to other unrelated parties, and recurrent short-term commercial use of the campus.

8. **Interaction with Traffic Patterns on and connecting to Whitehurst Freeway**

BC 18

The EIS is silent about the interrelationship between traffic on Canal Road and that on the Whitehurst Freeway. This is inexcusable, given that Canal Road feeds into the Whitehurst, and vice versa and that there is no exit between Key Bridge and the Georgetown U. access. Therefore any traffic passing that access point eastwards impacts upon that already congested and difficult intersection.

Conversely, westbound traffic passing the Whitehurst/Key Bridge intersection flows past the access.

It is therefore an inexplicable technical error that the study/studies on the Whitehurst Freeway have not been reviewed and the interactions assessed.

9. **Absence of substantive efforts at mitigation by GU**

a. Prospect Street

It is alleged that an important part of the traffic originates with the University. If this is true, then shuttle buses are immediate relief.

If it is not true, then the Canal Road project has little or no impact on the eastern side of the campus.

BI 19

Where does the traffic study trace the flows on the eastern and northeastern sides of the campus? How much traffic exists and enters the University from the east? Where was that surveyed in relation to the feeder roads to Prospect Street?

What is the foundation for any conclusion that the project mitigates congestion in the Prospect Street area or more generally to the east and north?

This must be clarified.

b. Non-conforming space use on campus:
Related traffic

H 20 | How much traffic is generated by non-conforming uses of the campus, such as the hotel, rentals to unrelated parties, or other commercial operations?

Have those uses been surveyed and reported?

How much could traffic be reduced if GU were obliged to limit campus occupancy to that for which it is zoned?

Example: the Marriott-operated hotel (see FOIA File "A" re "illegal" campus operations and Exhs. TRS-5 and 6).

Where is the type of use of existing buildings detailed and tested for conformity? Where are identified the numbers of such occupants in relation to observed traffic flows?

Where in the EIS is the effect of mitigation tested against the potential benefits of the project? (See also #1, above).

c. Coal deliveries

In the EIS for the proposed power plant GU argued that elimination of coal deliveries, if the gas-fired plant were built, would have a major impact upon traffic and pollution.

BY 21 | Where does the EIS assess the option of: 1) restricting such deliveries to off-peak hours and 2) eliminating all coal use to bring the existing utility plant into compliance with the clear air standards?

Coal deliveries are also a non-conforming use; where is the data on that traffic which could be eliminated as an alternative?

10. **Collateral traffic impacts**

a. Convent of the Visitation

AM 22 | How much traffic on 35th Street and the northern and eastern sides of the Campus is due to the Convent of the Visitation? Should they not be required to bus students in from satellite locations as well?

Ms. Eve Grimaldi, speaking at the public hearing, indicated some 300-400 cars per day. (See Hearing Transcript); the Convent officially supported all "build" options, indicating its concern for traffic.

Has mitigation by the Convent been considered as an option for reducing congestion. If not, why not?

In particular, why should other neighborhoods bear the consequences of the project while the Convent, which supports the project, is not required to reduce its own traffic?

Is the traffic originating with the Convent not itself non-conforming?

b. Convent of the Good Shepherd/Levine School Properties:
Proposed increase in traffic

BV 23 | Where does the traffic study include the planned/possible increase in traffic due to the proposed move of the Washington International School from its Olive St. campus to the site on Reservoir Road?

Possible traffic load -- 300 vehicles two times per day, coinciding with morning rush hour and the early part of afternoon rush hour.

Can a traffic study be deemed valid which omits such a major impact within the planning period? Why did the EIS not include this contingency, since the negotiations predate its drafting?

BV 24 | Did the traffic survey not review future developments?

11. Independence of consultant (HDR)

Z 25 Formal complaint has been filed with the office of the Inspector-General of DOT.

Review of the EIS, and the related materials from FOIA requests, indicates a persistent pattern of suppression, omission, and distortion of information, starting with false information being disseminated about the scale of the University's building program.

It is to be noted that HDR does more than half of its business with the one department. It is almost a "captive" consultancy and its independence of DOT -- and therefore its independence from any political pressures upon DOT -- cannot be ensured.

There is concern that the pattern of omissions is not accidental.

Note - precedent

The community has had prior experience with distorted EIS's. A consultant to GU/Dominion in the matter of the EIS for the power plant project admitted in the course of cross-examination that he had omitted a key section from EIS upon instruction from GU/Dominion (transcript - Case 888).

12. **Integrity of the Campus Plan and filings by GU**

A 26 History suggests strongly that filings by GU or information supplied by GU must be reviewed with more than ordinary care. The integrity and the validity of the Campus Plan cannot be taken for granted. Prudent review would recognize the long prior history by GU of violations of the Campus Plan, of zoning regulations, and of restrictions on land use. It must also weigh the prior history of false statements and the accumulating charges of fraudulent representations.

This history is important in understanding the community's response to this

newest project by GU. It is also important in determining the level of verification needed for materials from GU.

The history of bad faith requires that DOT apply a higher standard of proof. A summary list of such violations and misrepresentations includes:

- Construction and operation of a hotel on campus, including falsely declaring the use of the site and attempting to hide the existence of the hotel.[2]
- Construction (aborted) of a laboratory building for FIDIA, a now bankrupt Italian pharmaceutical firm (see Exh TRS-7).
- Effort to construct a commercial-scale power plant for Dominion Energy, trying to conceal the real purpose and ownership of the plant. (see discussion below of suit by DC government charging GU and its associates with fraud and conspiracy); see suit for fraud and conspiracy filed by DC Corporation Counsel against GU and its partners (Exh TRS-1).
- Tax fraud in connection with the Marriott hotel on campus (see Exh TRS-6); by misrepresenting the use of the building GU attempted to avoid DC taxation but was exposed by a former Council member.
- Tax fraud in connection with the transfer of ownership interest in the Alban Towers complex, an off-campus housing site; see Tax Court opinion -- Exh TRS-4.
- Multiple instances of construction and occupancy of buildings without construction permits, inspections, or occupancy permits. GU continues to occupy and use building in spite of violations.

There is a parallel history of false filings and fraudulent representations in the earlier dispute over the power plant; citations from the current suit against

---

2 Mr. W. Green, formerly VP of GU, denied its existence in the course of a videotaped District council hearing.

Dominion, which includes GU within the charges illustrate the assessment of the DC Corporation Counsel, backed up by potential testimony from community participants (see page 4 of TRS Exh-1):[3]

> "The fraudulent scheme included: the filing of false and misleading government permit applications; the submission of false and misleading documents in regulatory proceedings.....(op cit, p5)."
>
> "...the Dominion Group [including GU] worked to carry out their fraudulent scheme by submitting an EIS for Government and public review and comment containing false and misleading statements and omissions in the hope they could deceive Environmental Division officials, the public, and other and thereby win unwarranted and undeserved [emphasis in original] regulatory approvals."(op cit p15).

The community is concerned that the prior pattern is being repeated in the current proceeding.

3 Citation: Civil Action #93-2267, Counterclaim for Fraud...etc, filed 18 August 1995 in the U.S. District court for the District of Columbia.

13. **Failure to Notify Affected Commuter Groups in Virginia and Maryland**

CB 27

Commuters from Maryland and Virginia are directly impacted by the project and also by any disruptions during the construction period.

Where is evidence that such affected parties were informed? Where are responses or concerns from those parties.

If hearings were not held, or if such groups were not duly notified, why was this not done?

DOCUMENT 77

List of Exhibits:
Submission of Dr. T. R. Stauffer

TRS-1	Filing by DC Corporation Counsel in Civil Action #93-2267 (RCL); charges of fraud and conspiracy against Georgetown University and other parties.
TRS-2	Regardie's article – political patronage involving GU.
TRS-3	Regardie's article – tax fraud by GU exposed (Alban Towers).
TRS-4	First page of U.S. Tax Court opinion in tax fraud case involving GU (Alban Towers).
TRS-5	Advertising brochure (in part) for Marriott hotel on GU campus (non-conforming use)
TRS-6	Letter from DC Department of Finance and Revenue concerning taxes due on "illegal" hotel on campus.
TRS-7	Article from GU paper concerning lab building on campus under construction for FIDIA corporation.
TRS-8	Partial chronology of oil spills on GU campus and regulatory actions.

DOCUMENT 78

Sustainable Development Institute
[redacted] Washington, D.C. 20007

August 29, 1995

Mr. Arthur Hill
Federal Highway Administration
820 First St. NE, Suite 750
Washington, DC 20002

Dear Mr. Hill:

Re: Canal Road Project

A[1] The FHWA proposals regarding the Canal Road intersection would all help Georgetown without harming anybody. I urge that one of the four options be approved and that implementation begin as soon as possible.

My preference would be for any but the last option--there is already enough confusion in the District about rush-hour rules. But even this would improve what is currently a dreadful situation for Georgetowners near the University during the evening rush hour.

Thank you for your consideration. Sincerely,

Roger D. Stone
Director and President

Tel. [redacted] Fax [redacted] EMail: [redacted]

KENNETH TODD

[redacted]
Washington, D. C. 20009

May 22, 1996

Mr. Arthur J Hill
Division Adminstrator
FHWA
820 First Street NE
DC 20002

Dear Mr. Hill,

I revert to our correspondence last December regarding the Georgetown University Entrance Project.

At the meeting with Mr. Mirack and in my susequent letter dated June 12, 1995, I briefly described the "offside priority" concept, which can control traffic without a signal.

The proposed layout is to have two 30' breaks in the median and stop signs as shown in the enclosed drawing. The replacement of one, two or all of the stop signs by yield signs may be studied at a later stage. An actual trial at the site at a cost of a few thousend dollars will be the most realistic and economic way to determine the effectiveness of the installation.

AG[1] The layout can be visualized as an "offside priority roundabout" with the median between the two 30' breaks acting as the central island. Eastbound traffic in the right lane of Canal Road—being separated from the left lane by a double yellow line or a curb—will not have to stop for traffic from the University exit.

Like at a traffic signal, vehicles using the new layout will lower the (higher) eastbound volume on Canal Road in the A.M. hours and increase the (lower) eastbound volume in the evening. I understand that no projections of traffic volumes using the entrance under signal control are available.

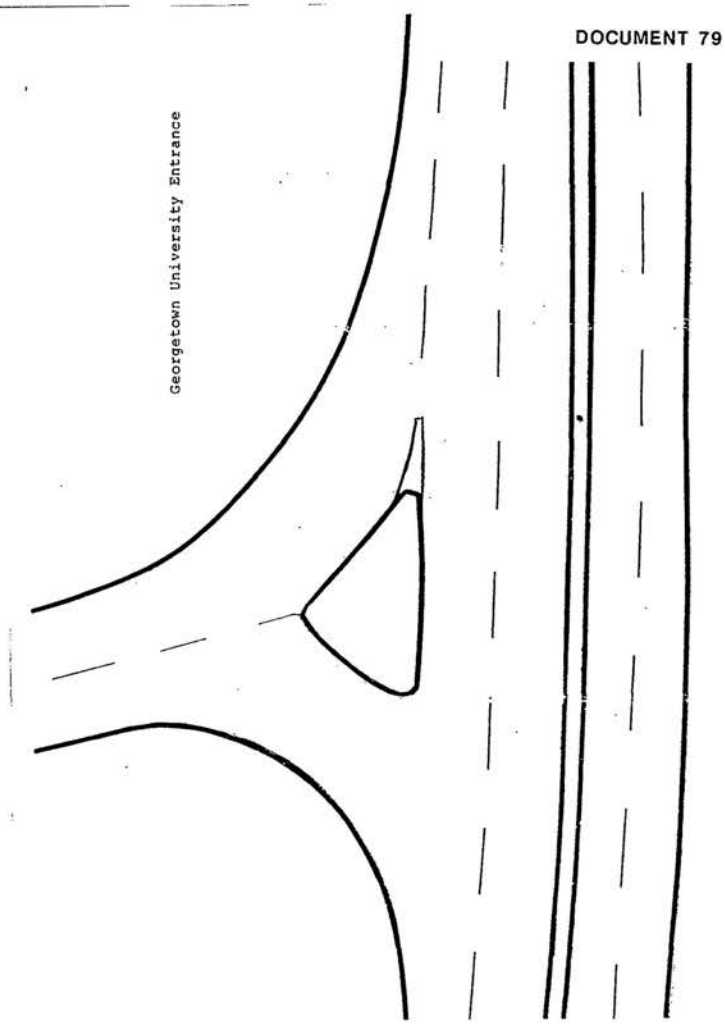
I would like to participate in discussions about the feasibility and in implementation of the project.

Yours sincerely,

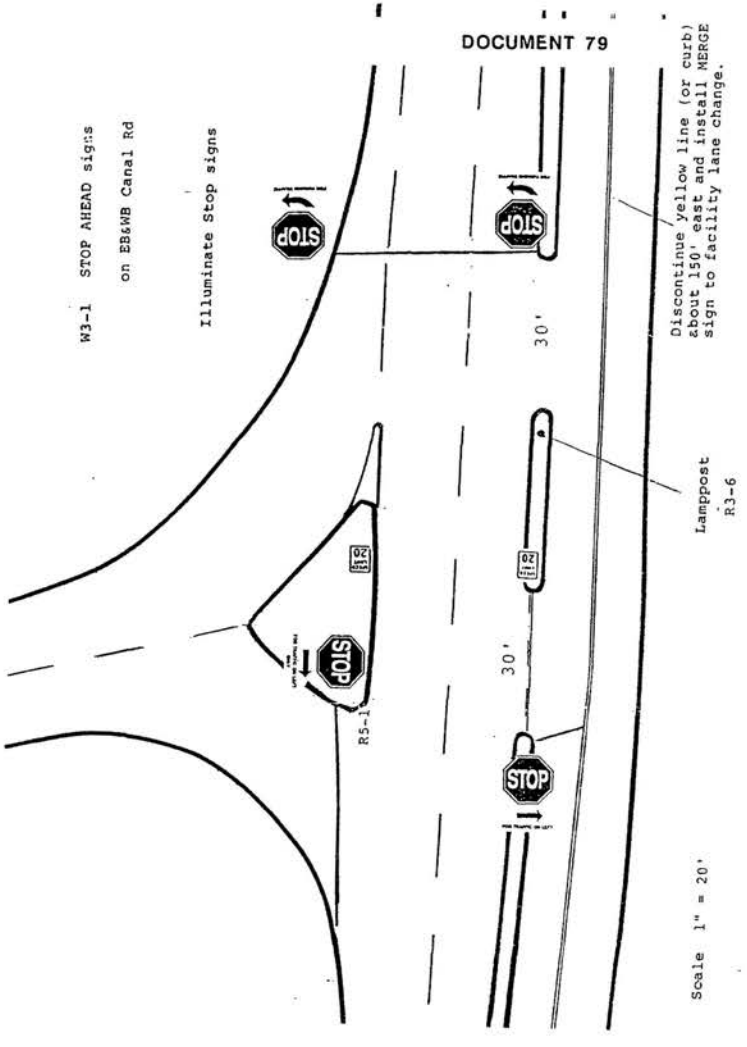
K. Todd

pc
E W Cleckley FHWA
NCPC

DOCUMENT 79



DOCUMENT 79



DOCUMENT 80

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

MARIA TYLER ▫ COMISSIONER ▫ SMD-2A03

[redacted] • Washington, D.C., 20037 • [redacted]

September 29, 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 Canal Road Entrance Project Build Alternatives

Dear Mr. Hill:

Following up on my oral testimony at the public hearing on September 19, 1995 on the Canal Road Entrance Project and the Resolution #95-9B passed on September 28, 1995 by the Foggy Bottom and West End Advisory Neighborhood Commission (ANC-2A), strongly opposing any of the build alternatives, including Alternatives 2 and 2A, and supporting the no build Alternative 1, I wish to submit the following written statement:

The ANC-2A District 3 which I represent includes the entire R-3 zoned purely residential Foggy Bottom Historic District (FBHD) and sits astride the residential 2500 and 2400 blocks of K Street, N.W. which are the eastern section of the Whitehurst Freeway (WHF), a Federal-aid primary highway. As is known, the east bound 2400 block of K Street is in the Foggy Bottom Historic District. The proposed build-alternatives of the Canal Road Entrance project claim to provide "solutions" to a problem that affects a private institution and a small area of residents, but that would shift some of the eastbound traffic onto the Foggy Bottom neighborhood, including but not limited to the above eastern section of the WHF, the heavily populated residential blocks of K Street, N.W., including the FBHD. **Traffic in these blocks is already operating at the worst, severely congested capacity during working days (at level of service F), with resultant serious safety problems at the heavily pedestrian crossing at 25th and K Streets, N.W., damage to the Foggy Bottom Historic District properties from traffic vibrations, and air and noise pollution seriously exceeding Federal standards. What is needed here is respite from traffic not the redirection, not even a marginal one, of additional traffic into it.**

BV 1
CH 2
AB 3

The above conditions of pedestrian safety, traffic vibrations, and air and noise pollution in the eastern end of the Whitehurst Freeway have either not been addressed at all in the draft EIS or touched on completely inadequately.

DOCUMENT 80

I join the many representatives of other neighborhoods surrounding the one small area for whom relief is being sought, in **strongly opposing the use of federal funds to be spent on any of the build-alternatives of the Canal Road Entrance Project, and in supporting the presently existing no-build Alternative 1.**

F 4

Yours sincerely,

Maria Tyler

Maria Tyler
Commissioner, ANC-2A03

DOCUMENT 81

COMMENTS ON THE TECHNICAL REPORT: PROPOSED SOUTH ENTRANCE TO GEORGETOWN UNIVERSITY FROM CANAL ROAD

DONALD VERSEY 1423 FOXHALL RD NW DC 20007 / 202 338 3784

BJ 1

Page 1-1 "The University is surrounded on three sides by residential neighborhoods----------moving traffic to Canal Road would reduce congestion on these local streets".

Comment: It would reduce congestion on two of the three sides mentioned and increase congestion on the third side (Foxhall Road).

AS 2

Page 2-2 "Commuters arriving on Canal Road and MacArthur Boulevard have to access the Prospect Street entrance by using Foxhall Road and Reservoir--"

Comment: There is no way one can turn north on Foxhall from MacArthur or Canal Road to access Reservoir and in turn Prospect. Do the authors of the report truly understand the traffic flows in this neighborhood?

AS 3

Figure 8 Illustrating the Metrobus routes at Foxhall Road. The eastbound route on Q Street has been left out. Busses cannot turn north on Foxhall from MacArthur.

Comment: This is another example of poor research or understanding of neighborhood traffic patterns.

AN 4

Page 2-11 The intersection of Foxhall and MacArthur is described as LOS B which is defined "on a rare occasion motorists wait through more than one signal indication"

Comment: Whoever made this judgement has not observed traffic in the morning rush hours at this intersection. I will offer a spot on my front porch at 1423 Foxhall any morning for another fact-finding team from HDR to see if they still think this is an LOS B intersection.

Page 2-13 Appears to contradict the judgement made on page 2-11 quoted above. On this page it says "Queues at Foxhall intersection usually cleared in one to three cycles" (more than on a "rare occasion" it would seem).

Page 5-3 Now the same intersection is described as "clearing in three to four cycles".

4 Comment: Pretty sloppy evaluation if it is described differently on three different pages.

BF 5 Page 2-13 Paragraph 2.6.3 Describing the general area road network: "the network is oversaturated and any small stoppage or delay dominoes and multiplies through the corridor."

Comment: What, then, is another traffic light going to be in this corridor if not another small stoppage and delay? How is this going to improve the matter?

Page 3-3 "Vehicles get to Reservoir Road from Canal Road via Foxhall Rd—"

Comment: This erroneous description of an impossible use of Foxhall Rd to get from Canal Road to Reservoir is repeated (see page 2-2) This is such a basic misunderstanding of the road pattern that one must doubt the competancy of the report!

BJ 6 Page 4-2 "Vehicles arriving on Canal Road and MacArthur Blvd would travel east on Canal Road and make a left turn--this would divert traffic from eastbound Reservoir Road and Foxhall Road—"

Comment: Absolutely untrue! Yes, traffic would be diverted from Reservoir Road east of Foxhall, but this traffic would use Foxhall south of Reservoir to get to Canal Road, and traffic on Foxhall would increase.

COMMENTS ON THE DRAFT EIS

R 7 Page 2 Paragraph 1 "Potential secondary impacts are possible if access is provided to private property currently landlocked--"

Comment: Please show detailed plat plans for all properties in this area so the public will gain an understanding of what this means and how it could be possible. Show also the proposed traded properties between GU and the NPS and the FHA. The sketch site plans do not show this detail.

AR 8 Comment: How long will the left-turn queueing lane be? How many cars?

CK 9 Comment: Inaccurate drawing indications show a retaining wall in section A-A west of the entrance. Is this supposed to be actually Section C-C east of the entrance?

WANNEN AND COMPANY
CERTIFIED PUBLIC ACCOUNTANTS
[redacted]
WASHINGTON, D.C. 20007-3214
[redacted]

September 8, 1995

Mr. Arthur Hill
Federal Highway Administration
820 First St., N.E. # 750
Washington, D.C. 20002

Re: Federal Highway Administration
(FHWA) Canal Road Project

Dear Mr. Hill:

We are writing to express our sincere hope that the FHWA proposed modification of Canal Road near Georgetown University's south entrance will survive the test of local politics. Steps are much needed to improve the traffic situation on Prospect Street where we live and work. As we are here at all times of the day we can assure you that our situation is far worse than the contemplated burdens expressed by our neighbors in Foxhall, the Palisades and Potomac, Maryland.

A 1 While all of us support Georgetown University, the daily flow of some 5,000 vehicles commuting to the University clogs our street, pollutes the air and in large part makes our neighborhood inaccessible for hours each day. We will attend the public hearing on September 19, 1995, but please do not hesitate to contact us regarding the situation on our little street.

Best regards.

Very truly yours,

John C. Wannen

JCW:jmw

DOCUMENT 83

OFFICERS

President
Michael N. Williams
Washington Harbour

President Elect
John M. Cole
Georgetown Park Associates, Inc.

Vice President
Paul J. Cohn
Restaurant Holdings, Inc.

Vice President
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Gertner Properties

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Yvette Carlucci
Riggs National Bank

F. Gregory Doherty
Nathans Restaurant

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National Park Service

Linda Greenan
Georgetown University

Alice L. Glen
The Newcomb Group

William Guillo
Trammell Crow Company

Silvia Hays
The Phoenix

Judy Hermann
Colonial Parking

Ivaldis Kavalunas
Benetton

Kimberly Krutles
Washington Valet, Cosmetics

Ginger Laytham
Clyde's Restaurant Group

Mary Matthews
Bogart Properties

Captain Barry Malkin
Metropolitan Police Department

Paul Moomjian
Garrett's Restaurant

Robert Pincus
Franklin National Bank

Joseph Pozell
Oak Hill Cemetery

Sheldon Repp
Sallie Mae

Nicki Setoodeh
Lorenzo

Joseph A. Turner III
Shiloh Construction Company

September 25, 1995

GEORGETOWN BUSINESS & PROFESSIONAL ASSOCIATION

Mr. Arthur Hill
Federal Highway Administration
Suite 750
820 First Street, NE
Washington, DC 20002

Re: Comments on Proposed Canal Road Project

Dear Mr. Hill:

C 1

On behalf of the Georgetown Business & Professional Association I am submitting comments on the Federal Highway Administration's Draft Environmental Impact Statement (DEIS) on proposed modifications to Canal Road at the entrance to Georgetown University. At a meeting on September 19, the Board of Directors of the Association voted unanimously to support FHWA Alternative 2 or 2A.

Traffic and parking are two of the most difficult problems facing the Georgetown business community. These problems are particularly severe in the area west of Wisconsin Avenue, near Georgetown University. Each weekday, hundreds of vehicles access and exit the GU campus via the University's Prospect Street entrance, causing massive traffic jams on Georgetown's residential streets and at the intersections of 33rd and 34th Streets, N.W. and M Street, N.W.

The daily traffic congestion adversely affects the Georgetown business community because it makes streets impassable to visitors seeking on-street parking or access to parking garages. The daily traffic congestion also creates obstacles for employees of Georgetown businesses who commute from Virginia and the western suburbs. The DEIS has concluded that much of this traffic could be eliminated from our local streets if university traffic could use Canal Road to travel between the campus and Key Bridge and the Whitehurst Freeway. Canal Road is an arterial street that is engineered to handle such commuter traffic.

We have reviewed the five alternatives described in the DEIS, and have concluded that Alternatives 2 or 2A, which call for an at-grade signalized intersection, are the best choices. These alternatives are the least costly, will have the least visual impact, and can be accomplished with the least disruption.

We urge you to move forward as soon as possible with the Canal Road project. It will improve traffic conditions for residents and for those who commute to work in Georgetown or to patronize its business establishments.

Sincerely,

Michael N. Williams
President

cc: Linda Greenan

[redacted] Washington, D.C. 20007-8765 • [redacted] • [redacted]

DOCUMENT 84

Robert and Huguette WILSON
[redacted]
DC 20007

D 1

Dear Arthur,

As residents of Georgetown for the past 35 years, we firmly support CANAL ROAD ALT. 2.

If the outlanders of VA and MD succeed in barring this ptoject the District should strongly campaign for a commuter's tax.
Wishing you success,

H Wilson
R Wilson

Sept. 25, 95

DOCUMENT 85

HERMAN WOUK
[redacted]
WASHINGTON, D.C. 20007

September 18, 1995

Mr. Arthur Hill
FHWA, Suite 750
820 First Street, N.E.
Washington, D.C. 20002

Dear Mr. Hill:

D[1] I write to support the proposal to relieve rush hour congestion in this neighborhood, the Canal Road Alternative 2 project. This daily gridlock is a continuing health and safety hazard to the community and to the drivers of the jammed-up vehicles. A relatively simple FHWA modification can remedy the situation, and I urge that the improvement go forward.

Sincerely,

Herman Wouk

Herman Wouk

DOCUMENT 86

September 1, 1995

Mr. Arthur Hill
FHWA Suite 750
820 First St. NE
Washington, DC 20002

Dear Mr. Hill,

A[1] I am writing to add my support to the Canal Road project.

Sincerely,

Mrs. Jean M. Mumma
[redacted]
Wash., DC 20007

ACTION
is assigned to
FHWA
CONTROL NO.
951024-029
SIMS S-10

DOCUMENT 87

[redacted]
Rockville, Md 20850
[redacted]

October 21, 1995
Dear Secretary Pena:

F[1] I am writing in regard to the possible Canal road construction. I ask that you object strongly to this stoplight which Georgetown University wants to put at one of the entrances to the university.

I have been commuting from Rockville for the past 7 years. Most of the time I commute by car rather than Metro because I work full-time at George Washington University, I am a full-time mother and have responsibilities both at work and at home which require me to have a car readily accessible to me.

During non rush hour I can return home within 30 minutes, however, the metro would take me one hour. My drive, during rush hour now takes 60 minutes (same as metro), however, with this possible traffic light, it is my understanding that the commute would take 90 minutes!

Aside from the endless commute it is my understanding that this beautiful road would be demolished in order to make room for the new road. It is one of the most beautiful entrances to downtown Washington from Maryland. One saving grace that I have each morning, is that if I have to sit in traffic, at least I can find some beauty in the environment and "cool out" before beginning an even more stressful day. If this construction is allowed to happen it would not only disrupt the natural beauty temporarily, it would effect it permanently.

If this construction is allowed to take place I would have to strongly consider changing jobs so that my commute would not be endless and stressful.. This would not only be a burden to me, it would also hurt the district. Other commuters like me, I'm sure, would consider changing jobs. We spend money in the district. We buy food and shop for items that we normally would purchase in Maryland and Virginia since we spend the majority of our day in the district.

Please oppose this construction and think of the commuters, for once. The stress of having a full-time job and family is extremely difficult. To add 30 minutes to a commute, as well as the stress of sitting in traffic is not only unsafe for us but it will also contribute unnecessarily to environment.

Sincerely,
Susan Yaffe-Oziel
Susan Yaffe-Oziel

OCT.24 '95 11:12AM 202 994 2589 P.2

DOCUMENT 88

Dear Senator,

F[1] I'm faxing this letter to you to voice my opposition to the construction of a new traffic light, traffic lanes and facility requested by Georgetown University, which is to take place along Canal Road and in the Palisades.

The firm that I am employed with is located in Bethesda, and as a Virginia resident I mostly commute over Key Bridge and through the Palisades on my way to Maryland. While I run into a bit of traffic on the bridge and on Canal Road, the rest of my drive is fairly pleasant given its expediency and the beauty of the Palisades neighborhood, an already designated historical site.

When I was made aware of the planned traffic light and ensuing planned build-out of Georgetown University, which would require its own traffic lanes, I was enraged. I would like to bring to your attention that in less than a one mile span, going from Key Bridge to the corner of Foxhall and MacArthur Blvd., there presently are three traffic lights. Wanting to add another light, and ensuing lanes, simply to accommodate Georgetown University faculty and employees would not only be arrogant, but also idiotic.

BK[2] The real reason behind all this is the planned build-out of Georgetown University, roughly the size of the Pentagon (3.8 million square feet), which will ruin the beauty of the Palisades as we know it. To the knowledge of everyone Georgetown University has no plans to increase its student body any time soon, yet the university plans to have the historical site status of the Palisades revoked.

AC[3] The Palisades is one of the nicest and greenest parts of our nation's capital. The trees and parks are ideal playing grounds for children, dog owners, and adults, and only a few of the reasons why many middle class residents of this metropolitan area decide to move into Washington.

V,BF[4] Many universities in this area have dealt with growth by building additional space off-campus or making use of vacant unused facilities, why should the case for Georgetown University be any different? Why should green spaces be sacrificed, and my already long driving commute be increased, to ease the travel of a few and to further enrich an already profitable university?

As a hard working tax payer I resent the prima donna treatment requested by Georgetown University, and ask you to fiercely oppose this request. Thank you for taking time to read my letter of concern.

Sincerely,
Stefano J. Young
[redacted]
Arlington, VA 22206
[redacted]

R-96X 2023334456 10-20-95 09:45AM P002 #38

[redacted]
Washington, D. C. 20007
[redacted] phone
[redacted]

September 30, 1995

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

By Fax to (202) 523-0181

Dear Mr. Hill:

This letter presents a portion of my concerns about the Canal Road Interchange project. In all cases, these comments assume only the at-grade build alternatives, as it is my understanding the National Park Service has indicated its unwillingness to support the Series 3 alternatives.

Because documents have not yet been received from the National Park Service, among others, sought under the Freedom of Information Act, I request an extension of time for filing comments on behalf of myself and the coalition of neighborhood groups directly affected by this project. Assuming the availability of these documents within the next ten days, our comments should be complete by the time of the National Capital Planning Commission meeting on November 2. Comments with your staff have indicated this would be acceptable without a formal extension of the comment period beyond today's date.

Also, under the Freedom of Information Act, I formally request access to the files at the Eastern Federal Lands Highway Division for documents that were not in the files I reviewed at your office, including correspondence (letters, memoranda, and meeting notes) with Georgetown University about this project, correspondence with HDR Engineering about this project (including the informal transcript prepared by HDR of the public meeting on 12/7/94), correspondence from FHWA to the National Park Service, and any further documentation with regard to the Riders Trust property. Through a copy of this cover letter to EFLHD, this request will proceed through both channels. I have separately requested Congressional correspondence about the project.

Thank you for your attention to our requests and our comments. Your staff have always shown courtesy in their dealings, which is appreciated.

Sincerely,

Barbara Zartman

DOCUMENT 89

Statement of Objections and Comments
Document No. FHWA-DC-EIS-95-001-D

General Comments:

Some of the difficulty in commenting on this DEIS involves the shifting assumptions and variables concerning the project. While this is perhaps unavoidable in one that has been under consideration for so long and has been the object of so much study and comment, it nonetheless presents certain challenges in making a complete record of objection. The two areas where this is perhaps most vexing are (1) the purpose of the project and (2) the "open" or "closed" status of Prospect Street. This variability will be referred to in the detailed comments that follow.

AB[1] *Was/is the relief of traffic to surrounding residential communities a serious purpose of this project? Is the closing of Prospect Street a planned, ultimate outcome of any build alternative?*

Similarly, the compulsion to abide by the language of the Georgetown University master plan seems to shift, depending on the topic. In terms of closing Prospect Street or the designing the South Entrance, the master plan is deemed not to be definitive. In terms of the traffic circulation, the master plan is deferred to absolutely - even to the point of ignoring contrary and undisputed **factual** information.

Y[2] *How binding was the language of the GU master plan in designing the parameters of the DEIS?*

Finally, according to presentations by FHWA staff at public hearings, certain "standards" limit FHWA's ability to respond to community concerns; for example:

BF[3] Our concerns about making worse an already intolerable traffic situation were met with the explanation that the Level of Service was already as low as it could be rated and thus the FHWA cannot view any worsening of traffic as having a negative impact.

AB[4] Our concerns about the negative impact on all the surrounding neighborhoods' traffic were met with the explanation that the "purpose" was only to ease access to the University and thus there was nothing that required a demonstration of its impact on surrounding neighborhoods.

Are these, in fact, the standards FHWA uses to deal with public concerns?

Legal Impediments:

In the sections below dealing with inadequacies of the DEIS, the vague treatment or absence of information may fall below minimum standards for a DEIS.

5 3X *Is there not a requirement that the DEIS fully disclose all controversy surrounding the project, all unresolved issues, all other federal actions (including other grants to GU and other FHWA projects in the immediate vicinity), in order to provide a realistic assessment of the impact of the project?*

Further, there are specific provisions that may preclude any build alternative.

- **Demonstration Project Language**

> "... a demonstration project in the vicinity of the C&O Canal in the District of Columbia for the purpose of substantially improving vehicle access at a major traffic generator without decreasing the efficiency of a Federal-aid primary highway."

6 BC The impact of both at-grade alternatives would, by this very DEIS language, worsen traffic on Canal Road and, it appears, on the Whitehurst Freeway. To cite just two passages of the report, (4.3.3) " ... However, the additional congestion and queuing along Canal Road would add to the energy usage for non-University traffic." "As noted for the non-University traffic, the added congestion on Canal Road for Alternative 2 would increase the energy usage for this alternative over the No Build or other three Build Alternatives."

The dialog about Whitehurst seems to fall into the "can't get any worse"/LOS F standard previously discussed. There clearly would be more traffic on the Whitehurst as a result of this project.

- **Section 4 (f)**

> "The Secretary [of Transportation] shall not approve any program or project which requires the use of any public owned land from a public park ... or any land from an historic site of national, state, or local significance unless: (1) there is no feasible or prudent alternative to the use of such land and (2) such program includes all possible planning to minimize harm to such park ... or historic site resulting from such use."

7 3M The DEIS does not in any way satisfy the 4 (f) standard in demonstrating that no feasible or prudent alternatives exist. Satellite parking facilities would reduce the traffic burden on Georgetown residential streets and allow the University to more adequately manage its transportation burden. The 2A option would provide relief for approximately 200 peak pm rush hour vehicles seeking to make left-hand turns from the University. Certainly some alternative exists that could bring the same level of relief to the Prospect Street residents without taking or endangering the half-dozen or more 4 (f) resources - and at less cost in tax dollars.

8 BK The visual scarring of the Potomac Palisades that would result from any build alternative would violate the very purpose for which the NPS holds the land: to protect the scenic views along the banks of the Potomac River. To replace this greensward with eight lanes of asphalt and retaining walls would appear to violate the NPS mission.

9 BQ *Is there not a requirement that the EIS discuss each 4 (f) item and prove each avoidance alternative, even if each is different for each 4 (f) property and even if none of them is included in the alternatives in the EIS?*

DOCUMENT 89

- **Soil Contamination and Pollution**

10 BR The DEIS acknowledges that the construction area encompasses an old trolley line with rich potential for contamination, as well as the university's own maintenance facilities which are listed as potentially contaminated (4.5). The NPS can accept no contaminated lands as part of an exchange of properties.

Should this matter not have been resolved before being presented to the public since it could make the project nonviable?

- **Negative Impact on Park Land**

11 P The DEIS barely discusses the potential impact of development of the Riders Trust property. It is clear that the NPS sought to have this matter resolved before the DEIS was presented to the public. The property lines were not even presented in plat maps in the DEIS, nor was there mention of the "takings" requirements that attend condemnation in the District of Columbia. The position of the Office of Corporation Counsel was not mentioned in the DEIS, although this would again have raised problems about the viability of the build options.

Certainly the building of townhomes adjacent to parkland would be unacceptable to NPS and to the community, as well as those bodies concerned with preserving the historic assets of the Georgetown area and of the C&O Canal itself. HFWA and NPS were aware of the owner's intent to exercise the building rights that would be triggered by opening a public road through Lot 822 or to demand compensation at its non-landlocked value. The DEIS lists the value of the property at its current assessment of $1 per square foot, when it appears FHWA knew the owner had already turned down an offer of $4 million from the NPS for the parcel. The figure you include in the DEIS for acquisition of right-of-way is $4,725.

Is this not an intentional undervaluing of the cost of the project to make it appear accomplishable within the existing demonstration project monies? Is there not an irresponsible element in opening public discussion about ways to deprive a property owner of his/her rights?

Other Comments:

12 AK - **Utilities.** The impact of construction on the water and sewer lines under Canal Road are dismissed, virtually out of hand, which is in contrast with recent assessments by the District DPW about their fragility and the potential for disastrous breakage during construction. There are no references to independent studies or DPW sign-off with regard to these utilities. The blasting that is referred to as essential to construction would appear to be outside standard District provisions and would appear to present significant risk.

Have the consequences of such breakage been anticipated? Where would costs for repairs or replacement of these utilities be covered? Has the damage to the C&O Canal that would result from such breakage been assessed? Has the economic impact on the

12 | *Georgetown business district been considered?*

- **GU Development.** The record is muddy with regard to the interrelationship of this entrance and the GU master plan, with the permission to build 3.8 million square feet of additional space. The DEIS says in several places that this project is not required for "the build-out," of podium buildings. But documents obtained under FOIA quote Tom Stallman, Georgetown's designated liaison under the Memorandum of Agreement, as saying:

13 |

> "the master planning approval process has pointed out the need to develop the southern entrance ... close down two east gates including Prospect Street ... Board of Zoning Adjustment requires them to have the southern entrance developed before going further with their campus development plans ..."

Was the statement inaccurate? Did Stallman misunderstand BZA requirements?

GU has stated in its response to the letter from a committee of the Citizens Association of Georgetown (on which I serve) that it plans to build Parking Garage III (with 1,300 spaces) on the site of Lot 3 (with 780 spaces). While the numbers in GU's response are inconsistent from the listing to the text (page 7), the total parking spaces in new podium buildings are shown to be in the range of 2,275 to 2,975 spaces.

14 | *Were these additional parking spaces figured into traffic studies or neighborhood impact assessments in preparing the DEIS?*

AV

There are several references to the divided university campus. Medical Center traffic is discounted as being separated, by zoning requirement, from the academic campus. However, the university discloses, again in the CAG response, that more than 600 passes have been issued to parkers to enable them to cross this lift-arm barrier. Since that is a greater number of vehicles than would be accommodated in the afternoon rush-hour left-hand turns from the new south entrance, it would seem to be a significant factor.

15 | *Did you consider the porous nature of the campus division? Did you anticipate that such passes constitute potential for eliminating the impact on neighborhood streets under a campus-wide traffic plan? Did you determine that no such redirection of traffic would ameliorate the burden on neighbors?*

AW

- **Costs of the Project.** The local match funds for this project were to be provided by a gift of scenic easement of 2.5 acres from Georgetown University to the Federal government. Indeed, the Memorandum of Agreement seems to require that the easement be granted before funds can be spent.

16 | *Has an appraisal been done of the proposed acreage? If so, is it adequate to cover the 20% match? If so, has the easement been placed in escrow? What arrangements exist to reimburse the 20% match for the $1.2 million committed to the project to date?*

BN

- **C & O Canal.** The DEIS, once again, dismisses any concern for the wall that divides the historic C & O Canal from Canal Road - and from the construction site of any build alternative. The technical report, however, indicates that the portion of the wall that is opposite the current drive (the old Fowlers Road) is probably one of the weakest portions of the foundation. The technical report cites the need for significant additional study and cautions about the ability of the wall to sustain any additional load during blasting and construction - or any additional load due to increased traffic. FHWA consultants indicate the wall will have to be rebuilt (HDR of 3/11/94): "DCDPW also asked about the impacts on wall on the canal. HDR stated that construction can't get close to it, and that it would have to be rebuilt."

17 | *Why was there no fuller discussion about risk to the Canal itself and about the work that would have to be done to assure its integrity? Were there efforts to estimate the cost of repair of any range of damage that might be done to the Canal wall?*

AX

- **Construction traffic detours.** Staff/consultant memos in support of this project indicate that it is intended to route traffic along Reservoir Road during construction; that single-lane-only traffic will be maintained in each direction during rush hours and that closings beyond this would be anticipated in non-rush hours. It appears that rerouting commuter traffic onto the Virginia portion of the George Washington Parkway has been dismissed as an alternative.

18 | *In light of the already clogged nature of Reservoir Road and the north-south feeders (33rd, 34th, and 35th Streets on the east and the Foxhall corridor on the west), what arrangements are being made to limit parking in order to handle the greatly increased traffic loads on these residential streets?*

BJ

CANAL ROAD PROTECTION COALITION

[redacted] • Washington, D. C. 20007 • [redacted]

ACTION
is assigned to
[redacted]
CONTROL NO.
951027-006
SIMS S-10

October 26, 1995

The Honorable Federico Peña
Department of Transportation
400 Seventh Street, S.W.
Washington, D. C. 20590

By fax to: (202) 366-7952

Dear Mr. Secretary:

Re: National Capital Planning Commission
Meeting of November 2, 1995
Canal Road Protect

This letter is to ask that you direct the Department's vote on the NCPC to delay any further consideration on the Federal Highway Administration proposal to build an entrance for Georgetown University on Canal Road.

J 1 The project would use millions of dollars in public funds to benefit a private, non-taxpaying institution to the detriment of area residents, commuters, and the historic parkland throughout the project site. Scarce federal resources for the District should be put to better use, benefiting the whole community and not one powerful part.

Every neighborhood organization surrounding the University* has taken a position against any of the construction alternatives being proposed by FHWA, as has every Advisory Neighborhood Commission that has taken a position on the project. They have done so because it is abundantly clear that this will make traffic much worse in an already overburdened corridor. The period of construction - perhaps two years long - would be truly horrendous for District residents and for the thousands of Virginia and Maryland commuters who need to use Canal Road to get to work. One lane of traffic would be all that would carry this load; others would be detoured to Reservoir Road and the narrow streets of Georgetown.

The legal impediments to proceeding with this project are at least three:

BP 2 1. Congress decreed that no funds should be expended for this project until a scenic easement was transferred on 2.5 acres of land from Georgetown University. To this date, no transfer (indeed no identification of the acreage) has occurred, and FHWA has expended $1.185 million. Under the Antideficiency Act, there could be personal liability for this unauthorized expenditure by DOT employees.

BC 3 2. Congress decreed that the project could not decrease the efficiency of a Federal-aid primary highway. The draft EIS makes clear it will do exactly that to Canal Road and (implicitly) to the Whitehurst Freeway. I say implicitly because the DEIS does not address the interface between this project and the Whitehurst, particularly the new construction of the western end of the Whitehurst.

DOCUMENT 90

BQ 4 3. Section 4 (f) park and historic lands may not be used unless it is demonstrated that no feasible or prudent alternative exists. The draft EIS fails utterly to demonstrate the absence of alternatives.

BO 5 In addition, the particular park land involved in this project was apparently acquired under the Capper Crampton Act of 1937, which requires the sign-off of the Governors of Maryland and Virginia before the use of that park land can be changed. This sovereignty provision should not be violated.

If a need exists to further review the facts relating to this project, we ask at a minimum that you direct the NCPC to postpone action on this project.

At the time Georgetown University first sought funding for this project, Father William George promised the Congress that the palisade park land would be protected: "... it is a serious concern of the Park Service that their park isn't scarred and is protected, and it is a major concern of the citizens of Palisades, that we don't do anything ugly that scars the view from across the river." [Hearings, Subcommittee on Surface Transportation, Committee on Public Works and Transportation, June 14-16, 1983, page 464]

Sadly, each of the proposals before the NCPC will do exactly that.

Sincerely,

Barbara Zartman

*One "umbrella" organization took a limited position in favor of Construction Alternative 2A, with a significant list of provisos.

DOCUMENT 91

[redacted]
Washington DC 20007
November 21, 1996

Dear Sir:

J[1] I understand there is another attempt to have the taxpayers provide Georgetown University with a new rear entrance at the expense of the many commuters who use Canal Road. This route is already a nightmare at rush hour (even without the Whitehurst construction). The lane-hopping newsboys have plenty of time to sell their papers as it is now.

AK[2] The environmental impact could be enormous, both on the Canal and on the adjoining palisades and 100-year old water mains which supply the city. More green spaces would be lost to development which could otherwise be accomplished within the body of the current campus. The AC[3] streets of Georgetown are not made to carry this kind of traffic, but they will bear the brunt of it. Reservoir Road was not built to be an arterial route.

F[4] Please oppose this effort to siphon tax dollars off for private benefit.

Sincerely yours,

Suzanne Kuser

DOCUMENT 92

KENNETH TODD

[redacted]
Washington, D. C. 20009
[redacted]

November 22, 1966

Mr. Frank Mirack
FHWA - UCTR HDA-11
820 First Street NE #750
DC 20002

Dear Mr. Mirack,

I am writing in reference to the Georgetown University/Canal Road project and my proposal for a low-cost layout that will allow turns from and into Canal Road to be made without the help of traffic signals.

AG[1] It has been pointed out to me that reviewers of my drawings, unaware of my May 22, 1966, letter to Mr. Hill (copy enclosed), may see the proposal as an allway stop rather than an offside priority layout. For this reason I am sending you another set of drawings, one of which shows the final intersection layout controlled by YIELD signs.

Please substitute the enclosed set of four drawings for the original one and pass this information to the persons involved in the project.

Thanking you,

Yours sincerely,

K. Todd

pc
E W Checkley, FHWA
NCPC

DOCUMENT 92

KENNETH TODD

Copy

[redacted]

May 22, 1996

Mr. Arthur J Hill
Division Adminstrator
FHWA
820 First Street NE
DC 20002

Dear Mr. Hill,

I revert to our correspondence last December regarding the Georgetown University Entrance Project.

At the meeting with Mr. Mirack and in my susequent letter dated June 12, 1995, I briefly described the "offside priority" concept, which can control traffic without a signal.

The proposed layout is to have two 30' breaks in the median and stop signs as shown in the enclosed drawing. The replacement of one, two or all of the stop signs by yield signs may be studied at a later stage. An actual trial at the site at a cost of a few thousend dollars will be the most realistic and economic way to determine the effectiveness of the installation.

The layout can be visualized as an "offside priority roundabout" with the median between the two 30' breaks acting as the central island. Eastbound traffic in the right lane of Canal Road—being separated from the left lane by a double yellow line or a curb—will not have to stop for traffic from the University exit.

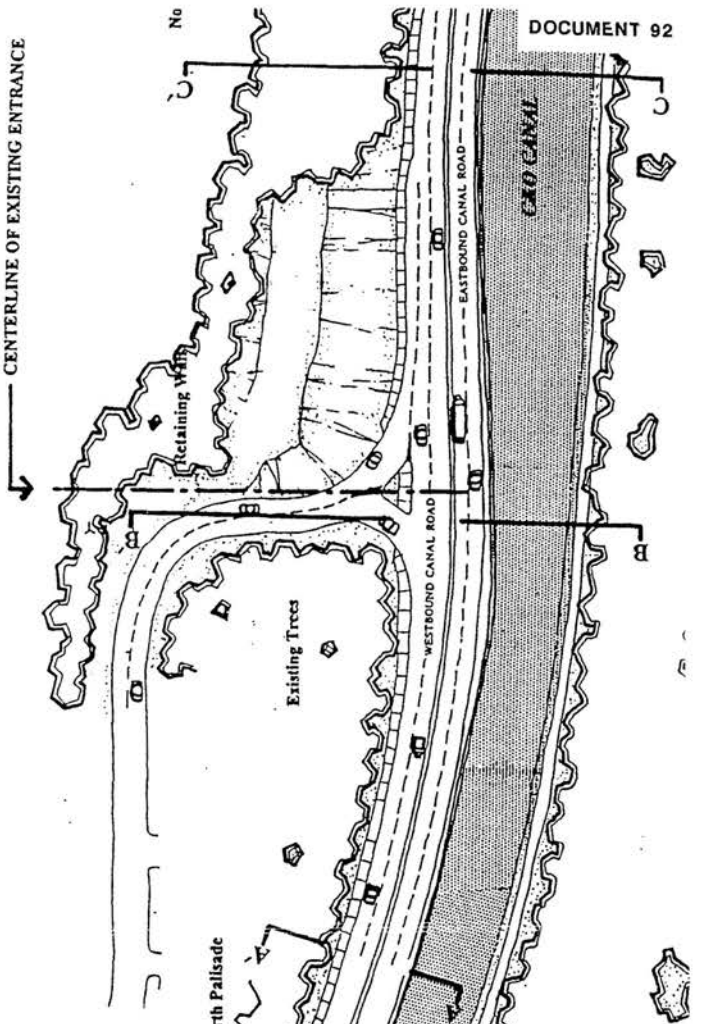
Like at a traffic signal, vehicles using the new layout will lower the (higher) eastbound volume on Canal Road in the A.M. hours and increase the (lower) eastbound volume in the evening. I understand that no projections of traffic volumes using the entrance under signal control are available.

I would like to participate in discussions about the feasibility and in implementation of the project.

Yours sincerely,

K. Todd

pc
E W Cleckley FHWA
NCPC



DOCUMENT 92

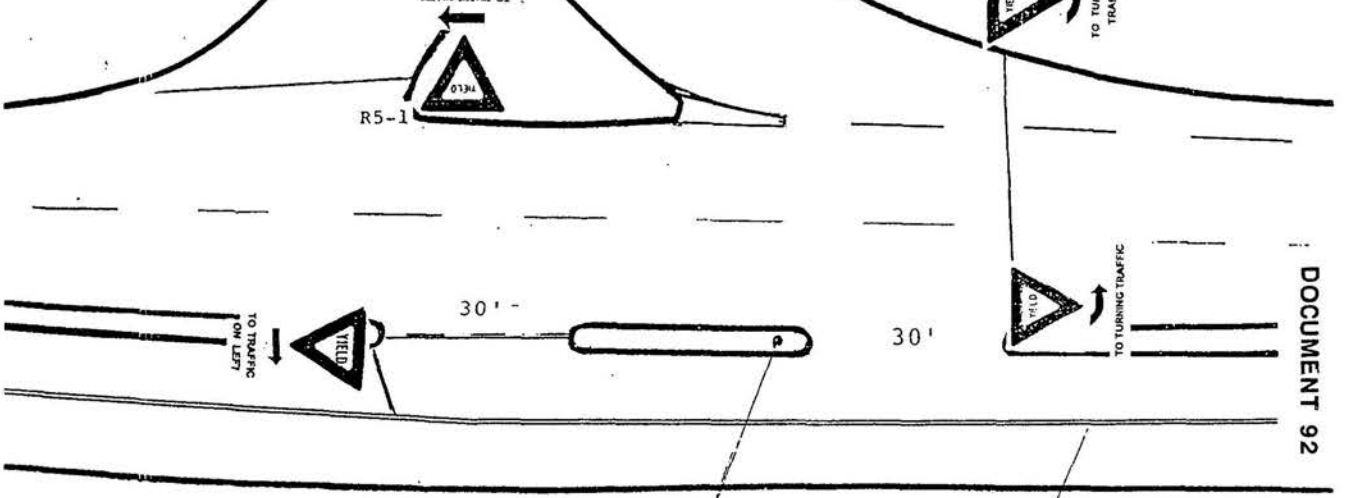
W3-1 Stop Ahead signs

on EB&WB Canal Rd

Intermediate Layout

Illuminate Stop signs

DO



Scale 1" = 20'

Lamppost

Discontinue yellow line (or curb) about 150' east and install MERGE sign to facility lane change.

★ ★ ★ Foggy Bottom and West End Advisory Neighborhood Commission (ANC-2A)

c/o St. Mary's Court [redacted] Washington, DC 20037 [redacted]

DOCUMENT 93

Nov
22 September 1997

Arthur J. Hill,Division Administrator
Federal Highway Administration
U. S. Department of Transportation
Union Station Plaza, Suite 750
820 First Street NE
Washington, D. C. 20002

RE: Decision to Change the Canal Road Entrance to Georgetown University

Dear Mr. Hill:

The Foggy Bottom and West End Advisory Neighborhood Commission, ANC-2A, which met on November 19, 1997 at a Monthly Public Meeting with due notice and with a quorum of 5 of the 6 Commissioners of the Commission present wants the record to reflect that this Public Meeting was held to consider FHWA's Network Simulation Traffic Operations Analysis III of the 6th of October 1997 for a possible change in the Canal Road entrance to Georgetown University under Congressional Authorization for this demonstration project. ANC-2A passed the enclosed Resolution 97-11A **in strong opposition** to a decision on the various build alternatives proposed for this Canal Road entrance because:

B 1

1. Congress mandated that this project could only be carried out "without decreasing the efficiency of a Federal-aid primary highway" but the efficiency of the Whitehurst Freeway, a Federal-aid Primary Highway, would be seriously decreased if any alternative is chosen except the no-build alternative.
2. This decrease in the efficiency of the Whitehurst Freeway could lead to a statutory "fatal flaw" negating any of the "Build" alternatives.
3. FHWA's recent traffic analysis does not include:
   a. the District of Columbia's request that the traffic analysis' eastern boundaries be 23rd Street NW, H Street NW and the Whitehurst Freeway **and**
   b. any increase in cars following the possible 3.8 million square foot expansion of Georgetown University as allowed in their Campus Plan of the year 2010.

DOCUMENT 93

4. Furthermore, to accommodate any build alternative, an additional 120 foot lane would be required at the intersection of Canal Road and the Whitehurst freeway.

ANC-2A respectfully requests that:

1. FHWA complete additional traffic analyses for the entire study area requested by the District of Columbia;
2. FHWA fully account for additional traffic for any Georgetown University expansion for the year 2016; and
3. The Federal Government not issue a legal opinion regarding the possible "fatal flaw" until these additional traffic analyses are prepared.

ANC-2A wishes that it be well understood that it fully supports the "No Build" alternative.

Respectfully yours,

Bernard Mozer

Bernard Mozer, Chairman
Advisory Neighborhood Commission -2A

encls: ANC-2A Resolution #97-11A

cc: The Honorable Marion Barry, Mayor, District of Columbia
The Council of the District of Columbia
The Honorable Dr. Andrew Brimmer, Chairman, Financial Control Board
Mr. Cell Bernardino, Director, D. C. Department of Public Works
Mr. Gary Burch, D. C. Department of Public Works
Mrs. Barbara Kahlow
ANC-2E Commissioner Westy Byrd
Foxhall Citizens Association President Scott Polk
Palisades Citizens Association President Peggy Pagano
Federation of Citizens Associations President Barbara Zartman

THE FOGGY BOTTOM AND WEST END ADVISORY NEIGHBORHOOD COMMISSION (ANC-2A) passed the following Resolution #97-11.

Whereas, in Sec. 149(a)(14) of Public Law 100-17, the Surface Transportation and Uniform Relocation Assistance Act of 1987, Congress authorized a demonstration project for a possible change in the Canal Road entrance to Georgetown University (GU) but stated that any such project could only be carried out "without decreasing the efficiency of a Federal-aid primary highway;"

Whereas, the Whitehurst Freeway is a Federal-aid primary highway;

Whereas, based on the Federal Highway Administration's (FHWA's) preliminary environmental impact statement (EIS), on 9/21/95, a Foggy Bottom and West End resident formally requested a Federal legal opinion if there, indeed, is a statutory "fatal flaw" which would negate the possibility of any "Build" alternative due to the decrease in efficiency for the Whitehurst Freeway under any of the "Build" alternatives;

Whereas, on 9/28/95, the Foggy Bottom and West End Advisory Neighborhood Commission (ANC-2A) passed a resolution (#95-9B) extensively commenting on the preliminary EIS and supporting the "No Build" alternative;

Whereas, FHWA's preliminary EIS stated that GU would expand 3.8 million square feet of building floor area by year 2010 (GU's 10-year campus plan, which ends in 1999, authorized a 3.8 million square feet expansion);

Whereas, on 9/18/96, ANC-2A passed a resolution (#96-9B) urging the National Capital Planning Commission (NCPC) to insist that FHWA prepare a supplemental EIS to include additional traffic analyses, including future increases in traffic by any GU expansion;

Whereas, ANC-2A in resolution #96-9B stated its belief that the decrease in efficiency for the Whitehurst Freeway under each of the "Build" alternatives is a statutory "fatal flaw" which should prevent any further consideration of any of the "Build" alternatives;

Whereas, on 11/4/96, the City wrote FHWA requesting the boundaries for the additional traffic analyses, with eastern boundaries including 23rd Street, H Street, and the Whitehurst Freeway;

Whereas, FHWA's recent traffic analysis does not include the City's requested eastern boundaries and is thus materially flawed;

Whereas, a resident of Georgetown proposed a so-called "Compromise Build" alternative which would still allow a left turn at Canal Road out of GU during the evening rush hour;

Whereas, FHWA's 10/6/97 Network Simulation Traffic Operations Analysis III does not include most of the City's requested study area, including the crucial 27th and K Street intersection (which currently operates at level of service F (FLOS), the worst level of service) and, instead, the eastern boundary of FHWA's additional traffic analyses is essentially the campus;

Whereas, FHWA's October 1997 data are substantially inconsistent with its July 1995 preliminary EIS, e.g., regarding cars using the Whitehurst Freeway in the morning which currently are unable to use the Whitehurst Freeway during the evening rush hour but which, under any of the "Build" alternatives, would be able to also use the Whitehurst Freeway during the evening rush hour;

Whereas, at the 11/4/97 meeting of the Georgetown ANC-2E, FHWA admitted that it estimated zero additional cars in year 2016 for any GU expansion; and

Whereas, at the 11/4/97 ANC-2E meeting, FHWA additionally admitted that to make a "Build" alternative feasible, an additional 120 foot lane at the intersection of Canal Road and the Whitehurst Freeway would be needed at an estimated cost of $100,000;

Therefore, be it resolved for the reasons cited above, that ANC-2A requests that: (a) FHWA complete additional traffic analyses for the entire study area requested by the City; (b), for year 2016, FHWA fully account for additional traffic for any GU expansion; and (c) the Federal Government not issue a legal opinion regarding the possible "fatal flaw" until these additional traffic analyses are prepared;

Be it further resolved that ANC-2A continues to support the "No Build" alterative and seriously objects to any "Build" alternative, including the so-called "Compromise" Build alterative.

DATE: _____

		AYE	NAY	ABSTAIN	ABSENT	MOVED	SECONDED
SMD	01 SWIFT				X		
	02 GEROE	X					X
	03 TYLER	X					
	04 MOZER	X					
	05 MILLER	X				X	
	06 MADDUX			X			

Bernard Moore

FAX TRANSMITTAL

MR. JIM SINNETTE — FRANK MIPACK

EFLH — 523-0172

(703) 285-0011

DOCUMENT 94

HAROL

Attorneys at Law

August 30, 1995

RECEIVED

JUN 05 1996

HDF

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

Via Facsimile and U.S. Mail

ATTENTION: Gerald Yakowenko

RE: Draft Environmental Impact Statement, Draft Section 4(f) Statement. [DEIS] Document No. FHWA-DC-EIS-95-01-D

Dear Mr. Hill,

You will recall that I wrote on August 9, 1995 on behalf of the Washington Metropolitan Area Riders' Fund [RIDERS' FUND] to request that the National Capital Planning Commission public hearing you requested be scheduled September 7, 1995 as well as the FHwA's own public hearing set for September 19, 1995 be postponed for at least thirty days.

Although I am out of the city, I have been advised that the NCPC has, in fact, rescheduled its hearing on this matter to its November 2, 1995 meeting, when it will be on the NCPC agenda. I also understand that the FHwA has not rescheduled its September 19, 1995 public hearing on the Draft Environmental Impact Statement.

In addition to the reasons set forth in my August 9, 1995 letter, I point out to you that Leonard N. Bebchick, Esq., lead counsel for the RIDERS' FUND has submitted to the FHwA as well as other Federal agencies requests under the Freedom of Information Act.

Therefore, I again request that the FHwA September 19, 1995 meeting be rescheduled as I requested.

Further a review of the referenced document, the DEIS, shows it is, *ab initio*, fatally flawed. The legislation in this matter clearly states that no Federal funds shall be expended on this matter until 2.5 acres of private property have been dedicated to the Federal Government as a scenic easement. Your office has repeatedly advised me, as has the National Park Service, that no such scenic easement has been dedicated.

1

BN

Would you be so kind as to advise me, on behalf of the RIDERS' FUND under what authority your office has expended the Federal funds used in preparation of the DEIS.

2

I have already submitted to your office evidence of ownership of the RIDERS' FUND properties.

Any questioning of that title as set forth in the DEIS is slander of title of the RIDERS' FUND interest in the property and will be dealt with appropriately by the RIDERS' FUND.

This is especially true since both your office and others who are parties to the Memorandum of Agreement dated September 25, 1991 have been on notice of RIDERS' FUND fee simple absolute title in the properties known as Lot 817 in Square 1272 and Lot 822 in Square 1321, both located in the District of Columbia and recorded appropriately in the Land Records of the District of Columbia.

As you must know, any condemnation requires at least two essential elements:

1. The power of eminent domain, and

2. The funds to acquire the specific property.

4

CN

While I recognize that both the Federal and District of Columbia governments have the power of eminent domain, the legislation under which you seem to be trying to operate requires that the scenic easement be donated by private parties and that donation will be construed to meet the requirement of a money payment participation on behalf of the District of Columbia. As you well know there is no interest on the part of RIDERS' Fund to make such a donation. It is the duty of counsel for RIDERS' FUND to maximize the return to the fund.

To my knowledge there are no government funds, either Federal or District, that have been requested, appropriated, donated or earmarked for such purpose. If I am incorrect in this, please advise *ASAP* stating.

The law further requires that a title search be performed by any United States or District of Columbia agency in contemplation of condemnation as outlined in the DEIS. Since knowledge of RIDERS' FUND's title in fee simple absolute was known prior to the preparation of the DEIS, the slander of title contained in the document may, along with other actions by the agencies and parties involved, have created an inverse condemnation of the RIDERS' FUND properties in the area covered by the DEIS.

I again refer you to my letter of August 9, 1995 regarding the change of position by FHwA regarding the exclusion of RIDERS' FUND from discussions and meetings with other private property owners in the area under review for the DEIS.

2

DOCUMENT 94

For all of the above reasons, I again request that your scheduled September 18, 1995 hearing or meeting be postponed.

During my absence from the city until September 7, 1995, I would request that any action or non-action on the part of FHWA be communicated to Robert D. Rondeau, Esq. of Warrenton, Va., whose address and telephone number and facsimile is listed below. He will then transmit the information to me while I am out of the country.

Very truly yours,

Harold Gordon
Special Counsel
The RIDERS' FUND

HG/ml

Robert D. Rondeau, Esq.
[redacted]
Warrenton, Va. 22186
[redacted]

HAROLD GORDON

Attorney at Law

DOCUMENT 95

[redacted]
Washington, D.C. 20036
[redacted]

[redacted]

[redacted]
Kensington, Maryland 20895
[redacted]

September 17, 1995

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

Via Facsimile and U.S. Mail
5"25-0192

ATTENTION: Gerald Yakowenko

RE: Draft Environmental Impact Statement, Draft Section 4(f) Statement. [DEIS] **Document No. FHWA-DC-EIS-95-01-D**

Dear Mr. Hill,

You will recall that I wrote on August 9, 1995 and August 30,1995 on behalf of the Washington Metropolitan Area Riders' Fund [RIDERS' FUND] to request that the FHwA's public hearing on the above referenced document set for September 19, 1995 be postponed for at least thirty days.

I have received your letters of August 22, 1995 and September 13, 1995. Neither of these responses are adequate to the questions raised in my previous correspondence to you, and certainly do not respond to Freedom of Information Act requests directed to you and your staff by Leonard N. Bebchick, Esq., lead counsel for the RIDERS' FUND.

I was advised by Gerald Yakowenko late last Friday, September 15, 1995 that some responses to those FOIA requests might be available from your Stirling, Virginia office on September 18. This obviously does not give the RIDERS' FUND or its counsel adequate time in which to prepare a for a so-called public hearing on September 19, 1995.

If, in fact, these responses are available, I requested that Mr. Yakowenko advise me or Mr. Bebchick as early as possible so that arrangements can be made for their delivery.

BN 1 With regard to your September 13, 1995 response dealing with the our questioning expenditure of Federal funds in contravention of the legislation which requires that the scenic easement be in place before Federal funds are expended, I do not believe there is a question of legislative intent. The statute's language is mandatory.

DOCUMENT 95

Thus your Agency's actions in this matter are without legal authority.

Mr. Yakowenko also advised me that our request for a continuance in this matter was denied by you. I point out to you that such decision isquite instistant with theextension of time granted to the National Capital Planning Commission, for its comments and approval, and not grant a similar extension of time to all other interested parties, including but not limited to RIDERS' FUND.

As for your September 13 response dealing with slander of title of RIDERS' FUND's fee simple absolute title it is simply inadequate. I suggest it is the duty of FHWA to ascertain title before it embarks on the slippery slope of suggesting and requiring another government, i.e., the District of Columbia, to condemn land for a Federal Project.

CN 2 Nowhere in the legislation is there any authority for either Federal or District condemnation of private property. I believe you will agree that the other signatory to your Memorandum of Agreement, Georgetown University, does not have condemnation authority.

Further questioning of RIDERS' FUND fee simple absolute title to its property by FHwA without any basis, will be dealt with appropriately.

RIDERS' FUND will appear at the so-called hearing you have scheduled for September 19, 1995 but it will appear under protest.

Very truly yours,

Harold Gordon
Special Counsel
The RIDERS' FUND

HG/hal

APPENDIX F-3

FHWA Letters Sent in Response to Comments

HFL-15

US Department of Transportation
Federal Highway Administration

November 17, 1995

400 Seventh St. S.W.
Washington, D.C. 20590

Refer to: HPD-1

Ms. Krista Eveland
4436 MacArthur Boulevard, NW.
Washington, DC 20007

Dear Ms. Eveland:

Thank you for the comments you provided recently to Secretary of Transportation Federico Peña regarding the Georgetown University Southern Entrance Project in the District of Columbia. I have been asked to reply.

This project began when Congress included a provision in the Surface Transportation and Uniform Relocation Assistance Act of 1987 authorizing $6.6 million for a demonstration project to improve motor vehicle access to Georgetown University at Canal Road. The Federal Highway Administration (FHWA), under an agreement with the District of Columbia Department of Public Works, the National Park Service, and Georgetown University, has taken the lead on the project. As with any project, the Georgetown University Southern Entrance Project is being developed in compliance with the National Environmental Policy Act of 1969 (NEPA) and other environmental and related laws, regulations, and policies.

In accordance with NEPA, the FHWA prepared a draft environmental impact statement (EIS) that evaluates all reasonable alternatives to the action and discusses why other alternatives, that may have been considered, were eliminated from detailed study. The alternatives identified in the draft EIS for the Georgetown University Southern Entrance Project are:

1: No action.
2: At-grade intersection with Canal Road and closure of the Prospect Street entrance to Georgetown University.
2A: At-grade intersection with no left turn out of Georgetown University to Canal Road in the morning rush hour, with the Prospect Street entrance open.
3D: Westbound Canal Road elevated to allow for an overpass.
3H: Canal Road depressed to create an underpass.

The two alternatives involving an at-grade intersection (2 and 2A) include adding a traffic signal on Canal Road.

Public involvement is an important part of any project. Therefore, we circulated the draft EIS for public comment in July 1995 and held a public hearing in September. We are now considering all the comments received.

We appreciate your letting us know of your concerns about the proposed project. If you would like to provide any additional comments, I suggest you send them to our Eastern Federal Lands Highway Office in the Loudoun Tech Center at

21400 Ridgetop Circle, Sterling, Virginia 20166. Although the formal comment period ended on September 20, we will attempt to consider any comments received after that date., I cannot predict the outcome, but I can assure you that the comments received on the draft EIS will be carefully reviewed before any decision is made on the Georgetown University Southern Entrance Project.

Sincerely yours,

Eugene W. Cleckley, Chief
Environmental Operations Division

FHWA:HPD-1:RWeingroff:rw:6-4856:11/13/95
FHWA Control No. SEE LIST ATTACHED
cc: HOAES
HEP-31

Mr. Ptak HPD-1
Mr. Heanue HEP-1
Files HPD-WU

Reader HEP-30
HPD-VS
HRA-03
HDA-DC (2)
HFL-15

FHWA:HPD-1:RWeingroff:rw:6-4856:11/13/95
FHWA Control No. SEE LIST ATTACHED
cc: HOAES
HEP-31

Mr. Ptak HPD-1
Mr. Heanue HEP-1
Files HPD-WU

Reader HEP-30
HPD-VS
HRA-03
HDA-DC (2)
HFL-15

IDENTICAL LETTERS TO:
Ms. Krista Eveland
4436 MacArthur Boulevard, NW.
Washington, DC 20007
FHWA Control No. 951024-005

Mr. Elliott Himelfarb
5005 Earlston Drive
Bethesda, MD 20816
FHWA Control No. 951101-010

Mr. Michael Hindman
632 Goldsborough Drive
Rockville, MD 20850
FHWA Control No. 951030-032

Mr. Vinnie McCollough
10808 Antigua Terrace
Rockville, MD 20852
FHWA Control No. 951030-031

Ms. Bonnie Panter
5821 Madaket Road
Bethesda, MD 20816
FHWA Control No. 951026-039

Jean K. Boek, Ph.D.
5011 Lowell Street, NW.
Washington, DC 20016
FHWA Control No. 951026-044

Mr. Michael Gladwin
2733 Rittenhouse Street, NW.
Washington, DC 20015
FHWA Control No. 951026-043

Joju Sebastian
and Mini Sebastian
113 Deer Park Lane
Gaithersburg, MD 20877
FHWA Control No. 951026-043

Mr. Jerome E. Joseph
9426 Turnberry Drive
Potomac, MD 20854
FHWA Control No. 951026-043

Ms. Susan Yaffe-Oziel
6 Owens Court
Rockville, MD 20850
FHWA Control No. 951026-021
S-10 Control No. 951024-029

Ms. Avery M. Farrar-Wellman
4452 Reservoir Road, NW.
Washington, DC 20007
FHWA Control No. 951026-021

Mr. Robert Ferguson
2350 Great Falls Street
Falls Church, VA 22046
FHWA Control No. 951026-021

Mr. Thomas N. Bulleit, Jr.
Hogan and Hartson
Columbia Square
555 13th Street, NW.
Washington, DC 20004-1109
FHWA Control No. 951026-021

Mr. Maurice Sanders
5622 Sherrier Place, NW.
Washington, DC 20016
FHWA Control No. 951024-006

HFL-15

US Department of Transportation
Federal Highway Administration

400 Seventh St. S.W.
Washington, D.C. 20590

FEB 6 1996

Refer to: HPD-1

Ms. Susan Kuser
2225 46th Street, NW.
Washington, DC 20007

Dear Ms. Kuser:

Thank you for your recent letter to Secretary of Transportation Federico Peña regarding the Georgetown University Southern Entrance Project in the District of Columbia. I have been asked to reply.

This project began when Congress included a provision in the Surface Transportation and Uniform Relocation Assistance Act of 1987 authorizing $6.6 million for a demonstration project to improve motor vehicle access to Georgetown University at Canal Road. The Federal Highway Administration (FHWA), under an agreement with the District of Columbia Department of Public Works, the National Park Service, and Georgetown University, has taken the lead on the project. As with any project, the Georgetown University Southern Entrance Project is being developed in compliance with the National Environmental Policy Act of 1969 (NEPA) and other environmental and related laws, regulations, and policies.

In accordance with NEPA, the FHWA prepared a draft environmental impact statement (EIS) that evaluates all reasonable alternatives to the action and discusses why other alternatives, that may have been considered, were eliminated from detailed study. The alternatives identified in the draft EIS for the Georgetown University Southern Entrance Project are:

1: No action.
2: At-grade intersection with Canal Road and closure of the Prospect Street entrance to Georgetown University.
2A: At-grade intersection with no left turn out of Georgetown University to Canal Road in the morning rush hour, with the Prospect Street entrance open.
3D: Westbound Canal Road elevated to allow for an overpass. Includes closure of the Prospect Street entrance to Georgetown University.
3H: Canal Road depressed to create an underpass. Includes closure of the Prospect Street entrance to Georgetown University.

The two alternatives involving an at-grade intersection (2 and 2A) include adding a traffic signal on Canal Road. The estimated cost of these alternatives is $1.7 million. The estimated cost of the overpass (3D) is $11 million while the underpass (3H) is estimated to cost $20 million.

Public involvement is an important part of any project. Therefore, we circulated the draft EIS for public comment in July 1995 and held a public hearing in September. We are now considering all the comments received.

We appreciate your letting us know of your interest in the proposed project. For further information on the impacts of the alternatives, I refer you to the draft EIS, which is available for review in public libraries in the District. If you are not able to locate a copy, please feel free to contact our Eastern Federal Lands Highway Office in the Loudoun Tech Center at 21400 Ridgetop Circle, Sterling, Virginia 20166 (telephone: 703-285-0085).

In addition, if you have any comments on the project after reviewing the draft EIS, please send them to the same address. Although the formal comment period ended on September 20, we will attempt to consider any comments received after that date. I cannot predict the outcome, but I can assure you that the comments received on the draft EIS will be carefully reviewed before any decision is made on the Georgetown University Southern Entrance Project.

Sincerely yours,

Eugene W. Cleckley, Chief
Environmental Operations Division

IDENTICAL LETTERS TO:
Ms. Susan Kuser
2225 46th Street, NW.
Washington, DC 20007
FHWA Control No. 960125-030

Mr. Cary M. Feldman
11101 Buckwood Lane
Rockville, MD 20852
FHWA Control No. 960123-044

FHWA:HPD-1:RWeingroff:6-4856:02/05/96 FILE NAME: C/DC/CANAL.6
FHWA Control No. SEE LIST ABOVE
cc: HOAES, HPD-1

HEP-1, HPD-VS
Files HPD-WU
HPD-1, HEP-31
Reader HEP-30
HRA-03
HDA-DC (2)
HFL-15

HFL-15

US Department of Transportation
Federal Highway Administration

400 Seventh St., S.W.
Washington, D.C. 20590

November 17, 1995

Refer to: HPD-1

95 DEC 21 A6:15

Mr. Joseph Kiriacos
Manager, Accounts Receivable
The Advisory Board Company
600 New Hampshire Avenue, NW.
Washington, DC 20037

Dear Mr. Kiriacos:

Thank you for your October 19 message to Secretary of Transportation Federico Peña regarding the Georgetown University Southern Entrance Project in the District of Columbia. I have been asked to reply.

This project began when Congress included a provision in the Surface Transportation and Uniform Relocation Assistance Act of 1987 authorizing $6.6 million for a demonstration project to improve motor vehicle access to Georgetown University at Canal Road. The Federal Highway Administration (FHWA), under an agreement with the District of Columbia Department of Public Works, the National Park Service, and Georgetown University, has taken the lead on the project. As with any project, the Georgetown University Southern Entrance Project is being developed in compliance with the National Environmental Policy Act of 1969 (NEPA) and other environmental and related laws, regulations, and policies.

In accordance with NEPA, the FHWA prepared a draft environmental impact statement (EIS) that evaluates all reasonable alternatives to the action and discusses why other alternatives, that may have been considered, were eliminated from detailed study. The alternatives identified in the draft EIS for the Georgetown University Southern Entrance Project are:

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- 3D: Westbound Canal Road elevated to allow for an overpass.
- 3H: Canal Road depressed to create an underpass.

The two alternatives involving an at-grade intersection (2 and 2A) include adding a traffic signal on Canal Road. The estimated cost of these alternatives is $1.7 million. The estimated cost of the overpass (3D) is $11 million while the underpass (3H) is estimated to cost $20 million.

Public involvement is an important part of any project. Therefore, we circulated the draft EIS for public comment in July 1995 and held a public hearing in September. We are now considering all the comments received.

We appreciate your letting us know of your interest in the proposed project. For further information on the impacts of the alternatives, I refer you to the draft EIS, which is available for review in public libraries in the District. If you are not able to locate a copy, please feel free to contact our Eastern Federal Lands Highway Office in the Loudoun Tech Center at 21400 Ridgetop Circle, Sterling, Virginia 20166 (telephone: 703-285-0085).

In addition, if you have any comments on the project after reviewing the draft EIS, please send them to the same address. Although the formal comment period ended on September 20, we will attempt to consider any comments received after that date. I cannot predict the outcome, but I can assure you that the comments received on the draft EIS will be carefully reviewed before any decision is made on the Georgetown University Southern Entrance Project.

Sincerely yours,

Eugene W. Ctreckley, Chief
Environmental Operations Division

FHWA:HPD-1:RWeingroff:rw:6-4856:11/13/95
FHWA Control No. 951026-038
cc: HOAES
HEP-31

Mr. Ptak HPD-1
Mr. Heanue HEP-1
Files HPD-WU

Reader HEP-30
HPD-VS
HRA-03
HDA-DC (2)
HFL-15

September 6, 1995

Mr. Arthur Cotton Moore
c/o Arthur Cotton Moore/Associates, P.C.
Washington Harbor
Suite 125
3050 K Street, NW
Washington, D.C. 20007

Dear Mr. Moore:

Your August 28 letter asked a few questions on the Georgetown University Southern Entrance project:

1. The ramp down to the C&O Canal path (north side) will not be affected by any of the alternatives in the draft EIS; our project does not go that far east.

2. None of the alternatives make any change to the current narrow walk along the south side of Canal Road adjacent to the canal wall. People are not encouraged to use this walk but rather the one on the north side; we are not planning a pedestrian crossing near the southern entrance. Any decision on widening this walk would have to made by the District Department of Public Works which owns and operates the road, taking into account relative priorities of road capacity and sidewalk pedestrian needs. Attached is a copy of a plan sheet from the Whitehurst Freeway reconstruction project which shows the DPW plans for encouraging people to cross Canal Rd./ M St. at the east side of the Whitehurst/Canal Rd. intersection.

3. The signalized intersection alternatives are not set up to allow westbound Canal Rd. traffic to u-turn to go back

- more -

eastbound (presumably to get to the Whitehurst Freeway?). This would be an unusual maneuver at any intersection.

Sincerely,

Arthur J. Hill, P.E.
Division Administrator

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

HFL-15

US Department of Transportation
Federal Highway Administration

November 30, 1995
Refer to: HPD-1

The Honorable John Warner
United States Senate
Washington, DC 20510-4601

RECEIVED
'95 JUN 11 AM

Dear Senatr Warner:

Thank you for your November 7 letter to the Federal Highway Administration (FHWA) on behalf of Mr. Stefano J. Young. You enclosed a copy of his letter opposing the addition of a traffic light on Canal Road as part of the proposed Georgetown University Southern Entrance Project in the District of Columbia.

This project began when Congress included a provision in the Surface Transportation and Uniform Relocation Assistance Act of 1987 authorizing $6.6 million for a demonstration project to improve motor vehicle access to Georgetown University at Canal Road. The FHWA, under an agreement with the District of Columbia Department of Public Works, the National Park Service, and Georgetown University, has taken the lead on the project. As with any project, the Georgetown University Southern Entrance Project is being developed in compliance with the National Environmental Policy Act of 1969 (NEPA) and other environmental and related laws, regulations, and policies.

In accordance with NEPA, the FHWA prepared a draft environmental impact statement (EIS) that evaluates all reasonable alternatives to the action and discusses why other alternatives, that may have been considered, were eliminated from detailed study. The alternatives identified in the draft EIS for the Georgetown University Southern Entrance Project are:

1: No action.
2: At-grade intersection with Canal Road and closure of the Prospect Street entrance to Georgetown University.
2A: At-grade intersection with no left turn out of Georgetown University to Canal Road in the morning rush hour, with the Prospect Street entrance open.
3D: Westbound Canal Road elevated to allow for an overpass.
3H: Canal Road depressed to create an underpass.

The two alternatives involving an at-grade intersection (2 and 2A) include adding a traffic signal on Canal Road.

Public involvement is an important part of any project. Therefore, we circulated the draft EIS for public comment in July 1995 and held a public hearing in September. We are now considering all the comments received.

We appreciate your letting us know of Mr. Young's concerns about the proposed project. If he would like to provide additional comments, I suggest he send them to our Eastern Federal Lands Highway Office in the Loudoun Tech Center at

21400 Ridgetop Circle, Sterling, Virginia 20166. Although the formal comment period ended on September 20, we will attempt to consider any comments received after that date.

I cannot predict the outcome, but I can assure you that the comments received on the draft EIS will be carefully reviewed before any decision is made on the Georgetown University Southern Entrance Project.

Sincerely yours,

Rodney E. Slater
Administrator

FHWA:HPD-1:RWeingroff:rw:6-4856:11/24/95
FHWA Control No. 951121-021
I Control No. 95-2046
cc: I, HOAES

Reader HEP-30
Mr. Heanue HEP-1
Files HPD-WU
HEP-31

HPD-VS
HRA-03
HDA-DC (2)
HFL-15

December 19, 1995

Mr. Kenneth Todd
1954 Columbia Rd. NW
Suite 707
Washington, D.C. 20009

Dear Mr. Todd:

Your December 11th letter to our Mr. Mirack requested access to certain documents concerning the Georgetown University Canal Road Entrance Project. A draft Environmental Impact Statement (EIS) was circulated for this project for public comment in July. A copy of that document and appendices, along with the public comments received on it, can be made available. We assume this satisfies your request. As mentioned to you before, your earlier comment is being considered along with other public comments, as if it were a comment on the draft EIS.

We will treat your request under Freedom-of-Information Act (FOIA) procedures. Please call Ms. Sarah Jeter at 523-0163 to arrange a time to review the information in our conference room. If you require copies of any information these can be marked and copies will be made subject to the normal FOIA fee calculation procedure.

Sincerely,

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

cc: Mr. Pete Kulyk, HAD-DC

US Department of Transportation
Federal Highway Administration

400 Seventh St. S.W.
Washington D.C. 20590

December 5, 1995

Refer to: HPD-1

Ms. Barbara Zartman
Canal Road Protection Coalition
1642 35th Street, NW.
Washington, DC 20007

Dear Ms. Zartman:

This is in further reply to your October 26 letter regarding the Georgetown University Southern Entrance Project in the District of Columbia.

My November 17 reply indicated that the Department of Transportation (DOT) is an *ex officio* member of the National Capital Planning Commission (NCPC). I have since learned that the DOT is not a member of the NCPC in any capacity.

I regret this error, but trust that it did not cause any inconvenience.

Sincerely yours,

Eugene W. Cleckley, Chief
for Environmental Operations Division

FHWA:HPD-1:RWeingroff:rw:6-4856:12/04/95
FHWA Control No. 951030-006
S-10 Control No. 951027-006
cc: S3, S10, C, P, B, HOABL, HOAES

File Name: c/DC/CANAL.3
HPD-1, HEP-1
Files HPD-WU
HEP-31
Reader HEP-30
HPD-VS
HRA-03
HDA-DC (2)
HFL-15

US Department of Transportation
Federal Highway Administration

400 Seventh St. S.W.
Washington D.C. 20590

November 17, 1995

Refer to: HPD-1

Ms. Barbara Zartman
Canal Road Prptection Coalition
1642 35th Street, NW.
Washington, DC 20007

Dear Ms. Zartman:

Thank you for your October 26 letter to Secretary of Transportation Federico Peña regarding the Georgetown University Southern Entrance Project in the District of Columbia. I have been asked to reply.

Your letter was prompted by the assumption that the Department of Transportation (DOT) has a vote on the National Capital Planning Commission (NCPC). However, the DOT is an *ex officio* member, without a vote. As you may know, the NCPC voted at its November 2 meeting to redraft the staff recommendations on the draft EIS to incorporate the members' concerns raised at the meeting.

Public involvement is an important part of any Federal-aid project. Therefore, we appreciate your taking the time to express your concerns. I will provide a copy of this correspondence to our Eastern Federal Lands Highway Office in Sterling, Virginia. Although the formal comment period ended on September 20, we will attempt to consider any comments received after that date. I cannot predict the outcome, but I can assure you that the comments received on the draft EIS will be carefully reviewed before any decision is made on the Georgetown University Southern Entrance Project.

Sincerely yours,

Eugene W. Cleckley, Chief
Environmental Operations Division

Original s
to U.
SES

July 26, 1996

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 preparing the Environmental Impact Statement (EIS) for a highway demonstration project in the District of Columbia. The proposed project improves the access to Georgetown University from Canal Road and has been designated as DE-0014(801). As a cooperating agency, you transmitted comments on the draft EIS, by letter dated November 9, 1995. We have carefully considered your comments and believe that the following responses will resolve your concerns. Therefore, we are requesting review and concurrence with our decision to proceed directly with the preparation of a final EIS at the Commission Meeting on September 5, 1996. We hope to have the final EIS ready for public distribution before the end of 1996. The basis of this request is discussed in this letter and enclosure.

Your November 9, 1995, letter requested that the FHWA prepare a supplemental draft EIS due to the extensive public interest in this project and due to new alternatives which have been suggested by the National Capital Planning Commission (NCPC) and others during the comment period for the draft EIS. We have studied the issues raised in your letter and considered your request in the context of the National Environmental Policy Act (NEPA) process and believe that a supplemental draft EIS is not warranted.

The Council on Environmental Quality regulations require a supplemental draft EIS if substantial changes are made in the proposed action that are relevant to environmental concerns; or if there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. The FHWA regulations interpret this to require a supplemental draft EIS if there are changes, new information, or further developments on a project which result in significant environmental impacts not identified in the draft EIS. If it is determined that the changes or new information do not result in new or different significant environmental impacts, this should be documented in the final EIS.

We have analyzed the three additional build alternatives recommended in your letter and concluded that all three alternatives are not reasonable due to environmental impacts, traffic impacts or cost. Therefore, since no new alternatives are to be added, a supplemental draft EIS is not required.

For the purpose of clarity, we believe that some of the discussions presented in the draft EIS needs revision, as noted in your November 9, 1995 letter. However, these revisions are not substantial and do not result in additional significant environmental impacts. Therefore, a supplemental draft EIS is not required. The information presented in the draft EIS is accurate and includes all significant impacts related to the draft EIS alternatives. In addition, this information has been made available to the public and all substantive comments will be considered during the preparation of the final EIS.

Other requests for additional information and studies (e.g. the calls for a comprehensive traffic plan for the entire Canal Road/MacArthur Boulevard corridor) are beyond the scope of the project and the NEPA process. In addition, based on this project's limited impact, we believe that these studies would not have an effect on our selection of an alternative and are not required as part of the NEPA process. Since receipt of your November 9, 1995, letter, in addition to feasibility studies on the three alternatives recommended in your letter, we have completed additional traffic counts at four intersections northeast of the project, and have met with the District of Columbia State Historic Preservation Officer to discuss impacts to the historic districts in the project area.

The following responses to your letter support our decision that a supplemental draft EIS is not warranted.

- more -

1. NCPC Comment. Comprehensive Plan policies need to be identified and the effect of each alternative should be evaluated.

FHWA Response. The general policies related to the Federal interests in the lands around the project area will be identified in the final EIS. The final EIS will specifically cite the Comprehensive Plan, and the specific policies, for the specific interests. Policies related to the special protections for special areas will also be noted in the final EIS. Also, the conformance of each alternative on these policies will be noted and will be taken into consideration during the decision making process.

2. NCPC Comment. The NCPC is committed to helping the NPS protect natural and historic features that convey special meaning to visitors and residents.

FHWA Response. The NPS is a cooperating agency in the NEPA process and the NPS and FHWA are both signatories to the MOA for this project. We have been coordinating with the NPS during the analysis of 4(f) impacts to NPS property.

The NPS has reviewed all project information available and has participated in the analysis of each alternative and potential project impacts. As well, the NPS will participate in the selection of the preferred alternative and all final design details.

3. NCPC Comment. A map that clearly delineates all parcels located between the University and Canal Road should be provided. They should identify the land title and jurisdiction of each parcel, including a history of jurisdiction transfers and the reasons for the transfers.

FHWA Response. A map will be included in the final EIS. Identification of the history of jurisdiction transfers, and reasons for the transfers for all parcels is considered beyond what is required by the NEPA process. It is important to identify the current land title and jurisdiction of each parcel within the project area. The discussion in the final EIS will include future disposition of land parcels, if known.

4. NCPC Comment. Alternative 2A presents a solution to the problem of improving access at the University entrance. However, the NCPC could not support Alternative 2A if it could potentially adversely affect the scenic environment and ecology of the Palisades through the facilitation of more intense development.

FHWA Response. The draft EIS discussed potential secondary development. The final EIS will clearly identify the potential secondary development impacts associated with each alternative and mitigation and avoidance measures, as required. The ownership of the private parcel of land between the University and Canal Road is in transition. Due to a May 1996 court action, that property is now held by the Washington Metropolitan Area Transit Agency (WMATA). WMATA is required to present its plans to the court to dispose of this land by July 31, 1996. The final EIS will include the latest status of the ownership of this private parcel.

Based on comments received to date, it is obvious that secondary development of this parcel that affects the aesthetics and ecology of the Palisades and results in additional traffic on the streets around the project is not acceptable. The alternative selection will be made accordingly.

5. NCPC Comment. Three additional alternatives should be examined. One is a modification to alternative 2A that moves the entrance road 200 feet to the east. The second is to provide a traffic circle at the intersection of Foxhall and Canal Roads. The third is to evaluate the District of Columbia's Department of Public Works alternative.

FHWA Response. All three alternatives were analyzed and summarized in the enclosure. The alternative to move the entrance road 200 feet to the east does not allow Prospect Street to remain open and requires a construction easement from the parcel of land held by WMATA. Due to these factors, this alternative is not considered reasonable.

The alternative to provide a traffic circle at Foxhall and Canal Roads would require taking 7 acres of Park land and reconstruction of Foxhall Road which results in a roadway grade of 18%. The capacity of the traffic circle would not be able to accommodate predicted year 2016 traffic volumes. Based on these impacts and a construction cost of over $3 million in addition to the actual construction of the entrance to Georgetown University, this alternative is not considered cost effective or reasonable.

The DC DPW alternative would require long, high retaining walls that would eliminate the bluffs between the existing entrance to the University and Grover Archbold Park. This alternative would also

- more -

require land from the parcel held by WMATA. Also, an additional leg would be required at the Foxhall and Canal Road signalized intersection which would result in a degradation of the operation at that intersection. Based on these impacts, this alternative is not considered reasonable.

6. NCPC Comment. The NCPC roles and responsibilities need to be discussed if a build alternative is selected.

FHWA Response. The final EIS will discuss the NCPC general planning and specific review and approval roles, including the responsibilities under the MOA, and the responsibilities as a cooperating agency.

7. NCPC Comment. Transportation issues that need to be assessed or more fully explained include possible queues, turning movements, construction impacts, and the project's conformity with Federal legislation.

FHWA Response. We believe that the draft EIS and the Traffic Technical Report provided an adequate analysis of the traffic impacts associated with each alternative. It is recognized that clarifications in the final EIS will be required. However, these clarifications will not significantly change the traffic impacts associated with each alternative. To clarify the study area for traffic impacts, a map showing the study area limits will be included in the final EIS.

The final EIS will include a discussion on each alternative's conformity with Federal legislation.

8. NCPC Comment. The analysis needs to examine the potential for queues on nearby roads such as upper Canal Road, Foxhall Road, Whitehurst Freeway, Key Bridge, and Reservoir Road.

FHWA Response. The concern for queues on these roads was conveyed to the FHWA immediately after distribution of the draft EIS. At the September 1995 Public Hearing, we presented display boards that showed the traffic generated by the University under the no build and build alternatives for the years 1996 and 2016. This was done to give an indication of the impacts of University traffic on the existing roads.

The final EIS will analyze intersections within the project's study area to determine the affect of University traffic on existing queues on Canal Road, Foxhall Road, Whitehurst Freeway, Key Bridge and Reservoir Road. This will be done by analyzing the amount of traffic generated by the University and its affect on a full cycle of the traffic signal at each intersection. This will give an indication on the affect of University traffic to the existing queues.

9. NCPC Comment. A discussion of turning movements should evaluate traffic weaving as eastbound Canal Road vehicles leaving the University approach the Whitehurst Freeway.

FHWA Response. For the traffic signal alternatives, traffic on Canal Road would be stopped by a signal. Therefore, weaving would not be required and there would be no impacts on Canal Road traffic due to weaving.

For the interchange alternatives, weaving conflicts were discussed in the draft EIS and will be repeated and clarified as necessary in the final EIS.

10. NCPC Comment. The EIS needs to assess the potential traffic delays and detours that could occur during construction if FHWA selects a build alternative.

FHWA Response. The final EIS will expand the discussion on traffic control from Section 4.6.3. of the draft EIS. This discussion will include construction staging, maintenance of traffic during construction, and traffic detours. Potential traffic delays will also be discussed.

11. NCPC Comment. FHWA should consider coordinating with the District, NPS and surrounding neighborhoods to develop a comprehensive traffic management plan for the area to address construction related issues, long term land use considerations, as well as transportation impacts.

FHWA Response. Developing and consideration of comprehensive traffic management plans and long term land use considerations are not within the scope of the project. The District of Columbia's transportation policy is to reduce traffic on residential streets and encourage traffic to use arterials, such as Canal Road. A build alternative would be in conformance with this policy.

The draft EIS identified direct and potential secondary impacts due to development, as required. Local land use decisions are the responsibility of the District of Columbia Board of Zoning Adjustment (BZA). BZA orders were used to evaluate present and future land use and development.

12. NCPC Comment. All alternatives should be evaluated for their compliance with the Clean Air Act Amendments and the Intermodal Surface Transportation Efficiency Act.

FHWA Response. A discussion of each alternative's compliance with applicable Federal laws will be included in the final EIS. This project is included in the latest Washington region conforming Long Range Plan and Transportation Improvement Program. These are in compliance with the Clean Air Act Amendments and the Intermodal Surface Transportation Efficiency Act and will be noted in the final EIS.

13. NCPC Comment. Future environmental documentation should more fully explain and pursue transportation systems management and transportation demand management methods. Georgetown University should state whether it uses or has considered satellite parking areas, particularly if the university owns any nearby land. The University should explore arrangements with business that could accommodate satellite parking and consequently, minimize traffic impacts in residential areas. Efforts should also be made to enhance the current G.U.T.S. shuttle bus service to increase its convenience.

FHWA Response. Transportation systems management (TSM) and transportation demand management (TDM) methods were explored for this project and summarized in the draft EIS. The BZA approvals for development at Georgetown University were studied. These approvals set many conditions for shuttle bus service, parking capacity, and traffic patterns within the University in addition to approvals for building construction. The TSM and TDM methods analyzed in the draft EIS were in compliance with these approvals.

We believe that further analysis of methods that do not address the purpose and need for this project are beyond the scope of the EIS and do not need to be included.

14. NCPC Comment. The document should evaluate environmental issues related to blasting activities and noise quality analysis. The analysis should provide assurance that if a build alternative is selected, blasting activities will not affect the structure or underlying foundation of the C&O Canal wall or affect soil stability. Blasting activities should be evaluated for potential effects on water pipelines and other utilities.

FHWA Response. All construction activities, including blasting and pile driving, will be designed to minimize effect on the C&O Canal wall or on any existing utilities. We are aware of the fragile nature of the Canal wall and the existence of underground utilities along Canal Road. We completed a structural analysis report of the Canal wall and an underground utility survey and used this information during the preparation of the draft EIS. The environmental impacts to the Canal wall and existing utilities, including noise and vibration impacts, related to blasting, pile driving, and other construction activities will be clearly specified in the final EIS. If necessary, blasting will be prohibited and mechanical means will be utilized during rock excavation.

15. NCPC Comment. The document should justify why level of service C was used to predict traffic noise levels instead of the projected level of services which range from D to F.

FHWA Response. Since level of service C represents the highest traveling speeds and volumes, it will result in the highest predicted noise levels. This is a very conservative approach to the noise analysis and will be noted in the final EIS.

16. NCPC Comment. The EIS needs to analyze impacts to the built cultural resources such as the C&O Canal Historic District and the Georgetown Historic District.

FHWA Response. We have met with the DC SHPO and will continue to coordinate the analysis of impacts to these historic resources. Comments from the DC SHPO and an analysis of the potential impacts on the cultural environment will be included in the final EIS.

If you have any questions concerning this letter or require additional information prior to the September 5, 1996, Commission Meeting, please do not hesitate to contact this office.

Sincerely,

Edward A. Sheldahl

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

Enclosure

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. Gary L. Klinedinst, Division Engineer, FHWA, Sterling, VA.
Federal Highway Administration

NCPC ALTERNATIVE 1
Shift entrance to University 250 feet to the east

PURPOSE - This alternative will avoid taking of the parcel of land held by WMATA.

DESIGN DETAILS - The signalized intersection will be moved approximately 250 feet to the east along Canal Road. The entrance road will be located east of the WMATA parcel.

The maximum retaining wall height along the northern edge of the entrance road is 47 feet. The length of this retaining wall is almost 400 feet. To construct the retaining wall along the southern edge of the entrance road, a construction easement for the WMATA parcel will be required. The maximum retaining wall height for this wall is 30 feet and it is approximately 100 feet long.

The amount of NPS property needed for this alternative is 1.2 acres. The amount of NPS property needed for Alternative 2/2A from the draft EIS is 1.0 acre.

TRAFFIC - The traffic impacts and operation will be identical to Alternative 2 from the draft EIS. Due to the close proximity of Prospect Street at the southwest corner of the University's New South Building, only emergency vehicle traffic can be maintained on Prospect Street without reconstruction of Prospect Street and the area adjacent to the New South Building. Therefore, traffic operation identical to Alternative 2A from the draft EIS, which requires Prospect Street to remain open to public vehicular traffic cannot be utilized with this alternative.

COST - The estimated construction cost for this alternative is $1,775,000. The estimate for Alterative 2/2A from the draft EIS is $1,700,000.

CONCLUSION - This alternative does not allow for Prospect Street to be kept open to public vehicular traffic and requires a construction easement from the WMATA parcel, which may not be obtainable if there is still opportunity for private development of the parcel. Based on the above, this alternative is not considered reasonable.

NCPC ALTERNATIVE 2
Traffic circle at Foxhall and Canal Road intersection

PURPOSE - This alternative will allow traffic leaving the University to use Key Bridge and the Whitehurst Freeway without directly turning left onto Canal Road. Also, the traffic circle is intended to provide a traffic benefit to users of Canal Road and Foxhall Road.

DESIGN DETAILS - A traffic circle with an inscribed circle diameter of 260 feet would be constructed at the intersection of Foxhall Road and Canal Road. Based on current traffic circle criteria, three entry lanes and three circulating lanes are required.

All approach roadways (Foxhall and Canal Roads) must be widened to three lanes.

Reconstruction of the Foxhall Road approach would result in a 18% grade on Foxhall Road and a 20 mph stopping sight distance. The existing grade on Foxhall Road is 10%.

Approximately 7 acres of NPS land from the Glover Archbold Park would be required.

TRAFFIC - This alternative does not satisfy the purpose and need for project. Eastbound traffic on Canal Road cannot access the Canal Road entrance to the University.

Traffic circles are generally not suitable where reversible lanes exist (Canal Road), due to problems with signing reversible lanes at a traffic circle.

The traffic circle would have acceptable operational capacity for existing (1996) traffic. However, the capacity of the traffic circle would not be able to accommodate predicted 2016 traffic volumes.

COST - The estimated construction cost for the traffic circle is $3,500,000.

CONCLUSION - Based on this alternative's inability to satisfy the project's purpose and need, the impacts to NPS land and the minimal traffic benefits, this alterative is not considered reasonable.

NCPC ALTERNATIVE 3
Extend University entrance parallel to Canal Road and to the intersection at Foxhall and Canal Road (Proposed by the DC DPW)

PURPOSE - This alternative is intended to reduce the traffic impacts to Canal Road by allowing traffic exiting the University to access Key Bridge by turning left onto Canal Road at the existing intersection of Canal Road and Foxhall Road.

DESIGN DETAILS - A one lane road would be constructed along the north edge of Canal Road from the existing University access to the intersection of Canal and Foxhall Roads.

A retaining wall approximately 1,000 feet long would be required along Canal Road. The maximum height of the retaining wall would be 35 feet and construction of this wall would eliminate the bluffs between the University entrance and Glover Archbold Park.

Approximately 5 acres of NPS land from Glover Archbold Park would be required and land from the WMATA parcel would be required.

Modification to the existing pedestrian underpass at the Canal Road and Foxhall Road intersection would be required.

TRAFFIC - This alternative does not satisfy purpose and need for project. Eastbound traffic on Canal Road cannot access the Canal Road entrance to the University.

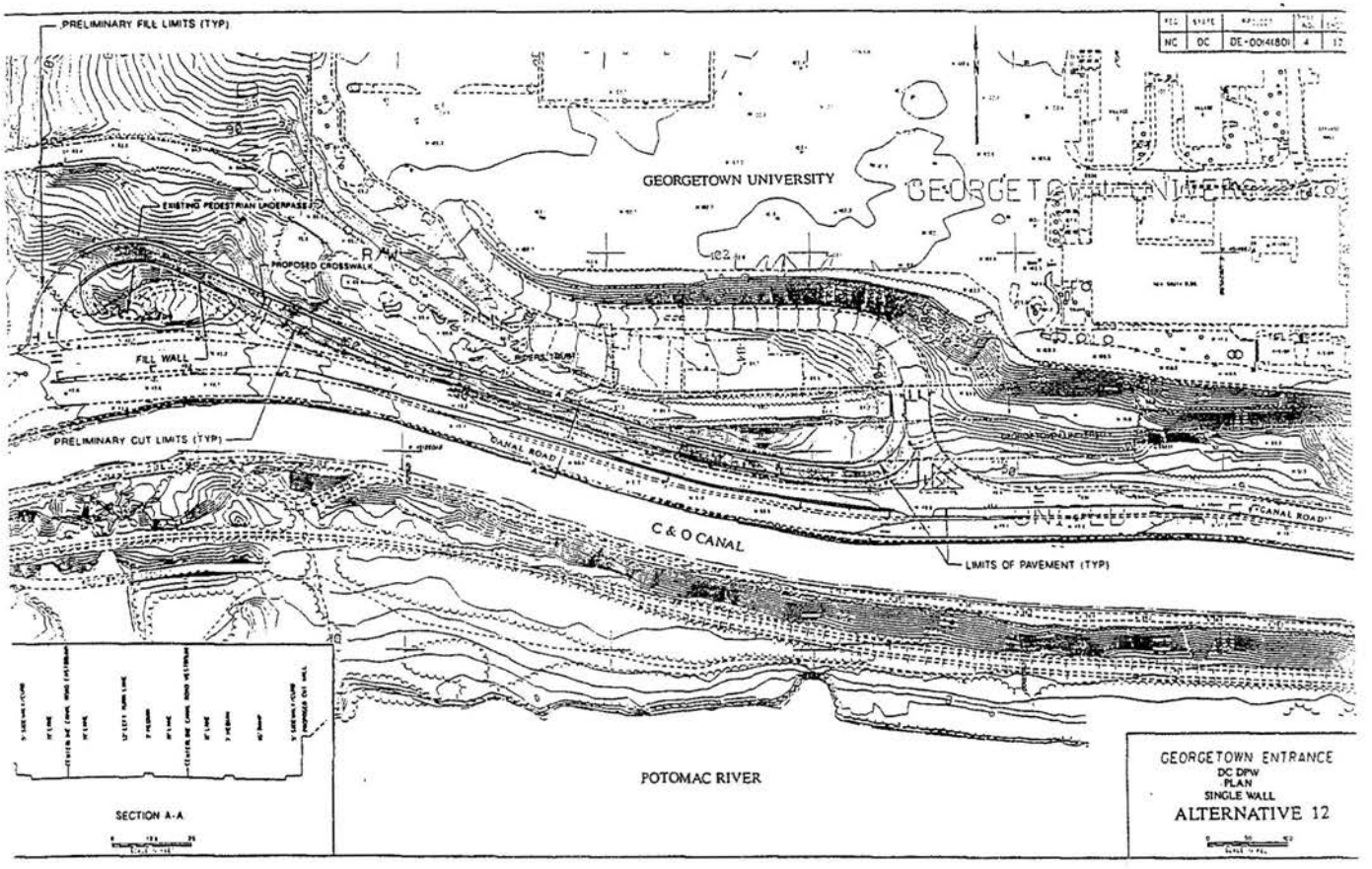
Another approach is required at the signalized intersection at Foxhall and Canal Roads. This would result in more congestion at this intersection. At the signal, time allocated to the existing movements would have to be shortened to provide time for the new approach. Also, the westbound Canal Road to Foxhall Road movement which currently does not stop, would have to stop, thus incurring delay.

COST - The estimated construction cost for this alternative is $2,500,000.

CONCLUSION - Based on this alternative's inability to satisfy the project's purpose and need, the impacts to NPS land and the minimal traffic benefits, this alterative is not considered reasonable.

NCPC ALTERNATIVE 2

NCPC ALTERNATIVE 1



NCPC ALTERNATIVE 3

Federal-aid
Project IX-1102(16)
Whitehurst Freeway
Canal Road Change

November 4, 1996

Mr. Cellerino C. Bernardino
Acting Director
D.C. Department of Public Works
2000 14th Street, NW
Washington, D.C. 20009

Attention: Ms. Karen Benefield

Dear Mr. Bernardino:

Before going too much further with the Whitehurst Freeway reconstruction, we want to bring up the possibility of modifying the west approach to the Canal Rd./Whitehurst Freeway intersection to make it 3 lanes wide going eastbound.

Currently, the intersection has a free right turn lane and a thru/right combination lane; we propose another thru lane be added. We realize the entire roadway width is narrow, but believe this can be done by eliminating the median (we are bringing this up now before stage 4 of the Whitehurst contract will place a portion of the median back), and narrowing the lanes in both directions. We believe this may be possible without modifying the retaining wall along the south side. We understand this will involve moving the light poles out from the median to the sides, and the possible addition of lighting conduits along the south retaining wall.

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We want to see if this change can be made to the current contract. We originally considered this change in concert with the proposed Georgetown University southern entrance project, but it also may have immediate benefit given your planned modification to the Key Bridge/M St intersection striping to move more traffic thru that intersection. Please contact Frank Mirack at 523-0172 when you are ready to discuss this change.

Sincerely,

Edward A. Sheldall

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

cc: Mr. Luke DiPompo, DECA, BTCS
Mr. Dave Devine, BTS, Traffic Ops
Mr. Bill McGuirk, BTS, Signals
Mr. Jeff Knoedler, NPS

File: IX-1102(16) (fm5602dt.ln6)
IX-1102(17)
FM:cm

FAP No. DE-0014(801)
Georgetown University
Southern Entrance
Response to comments

June 29, 1998

Mr. Cellerino Bernardino
Director
DC Department of Public Works
2000 14th Street, NW
Washington, DC 20009

Attention: Mr. Kenneth Laden

Dear Mr. Bernardino:

We would like to take this opportunity to respond to various correspondence concerning this project.

A. Your letter of November 4, 1996, and your clarifying letter of December 6, 1996, stated that the District of Columbia Department of Public Works (DCDPW) supported the National Capital Planning Commission's (NCPC) request that the FHWA assess an additional alternative in the Final Environmental Impact Statement for the Canal Road entrance to the Georgetown University. This alternative consisted of an additional variation of an at-grade signalized intersection and a median break at the Canal Road entrance. In addition, your letters requested expanded traffic studies be performed of the proposed entrance impacts on the surrounding community.

1. Alternative

We have investigated the additional alternative described in your letters as well as other related alternatives involving a median break and intersection improvements at the existing Canal Road entrance. All of the alternatives studied, including the one discussed in your letters, are variations on the Draft Environmental Impact Statement Alternative 2A.

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Evolving from your recommendation, and based on our studies, we are leaning towards a different modification to Alternative 2A (see enclosed drawing) which minimizes the construction impact of the intersection improvements and minimizes traffic impacts to the surrounding network, while still providing full access at the Canal Road entrance. This alternative addresses the majority of concerns expressed by the community and various agencies while substantially improving access.

This alternative continues to prohibit left turn movements from the Georgetown University onto Canal road during the AM peak period. This will allow eastbound Canal Road traffic to move uninterrupted throughout the AM peak period. An adequate left turn storage lane would be constructed on Canal Road for left turns into Georgetown University to minimize traffic impacts on eastbound Canal Road. This alternative includes intersection improvements at the Whitehurst Freeway and Canal Road intersection as a mitigation to reduce traffic impacts of the new entrance along Canal Road. (See your April 9, 1997 letter on this subject). As shown on the enclosed drawings, these improvements provide three eastbound Canal Road lanes configured as a through, a through/right turn, and a right turn only lane (onto the Whitehurst Freeway).

We will include our analysis of this modified alternative in the Final Environmental Impact Statement.

2. Traffic Study

As requested in your November 4, 1996 letter, we have performed a traffic study on the impact of the proposed entrance improvements and signalization on the surrounding community. Our study began by examining roads and intersections in detail to determine where impacts occurred. An origin/destination survey was conducted with vehicles using the south academic campus parking lot of Georgetown University. The findings of this survey along with existing and future traffic volumes were used to determine changes in the traffic volumes on the surrounding road network resulting from the improvement of the Canal Road entrance. Once the outer limits of project impacts were found, we ended our detailed traffic analysis and verified that it would be reasonable to conclude that there would be no negative traffic impacts beyond the area of our detailed analysis. Enclosed is a network simulation traffic operations analysis, dated October 6, 1997, of Foxhall Road from its intersection with Reservoir Road to its intersection with Canal Road, and Canal Road/M St. from its intersection with Foxhall Road to the Key Bridge intersection. We used this network simulation to respond to the public's request for a more accurate modeling of the project traffic impacts and to provide a better depiction of the interaction of the roadway network, especially in saturated and over-saturated conditions.

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A statistical analysis indicated that six different runs of the model would result in a 90% confidence level. Therefore, six runs of the model for each of the no-build and build scenarios for both the 1998 and 2016 time frames were made. These runs incorporate the current construction changes on the Whitehurst Freeway at Canal Road for both the no-build and build scenarios. The build scenario includes the modified Draft Environmental Impact Statement Alternative 2A concept, mitigation improvements on Canal Road at Whitehurst Freeway and signal timing changes to account for traffic growth, and traffic shifts because of the new entrance. The signal timing adjustments are within the parameters defined in discussions with DCDPW's Bureau of Traffic Services.

Based on O/D surveys and this analysis, we believe that noticeable traffic impacts associated with the project do not extend beyond the intersections studied. At some intersections within this corridor, the intersection delay increases a very small amount; at others, the delay decreases. We also performed an intersection analysis of the Whitehurst Freeway/K Street/27th Street intersection to ensure that negative traffic impacts did not occur on Whitehurst Freeway beyond the Canal Road intersection (see enclosed analysis titled "K Street and Whitehurst Freeway"). The 13 additional vehicles in the PM peak hour that are projected to use the Whitehurst Freeway account for an increase of 0.35% in the intersection volume and results in about 0.2 second increase in intersection delay. In addition, we have performed a traffic analysis for streets east of the Georgetown University to determine project benefits on and around Prospect Street (see enclosed analysis titled "Intersections East of Georgetown University"). The results of this analysis show that the anticipated reduction in trips east of the campus due to traffic diverted to the proposed Canal Road access do not have a significant impact on the level of service. The decrease in intersection delay ranges from 2.2 seconds to 0.3 seconds with the majority of the reductions being less than 1 second. However, approximately 78 vehicles (26%) during the AM peak period and about 200 vehicles (43%) during the PM peak period would be diverted from the Prospect Street entrance to the Canal Road entrance under the build scenario. This results in reduced traffic volumes on residential intersections east of Georgetown University, as shown in the analysis.

These traffic analyses are based on the assumption that only vehicle trips to the south campus of the Georgetown University are affected by the proposed entrance. The origin and destination of those trips do not change based on the configuration of the Canal Road entrance. For example, vehicles coming from Virginia via Key Bridge to the south campus parking lot will still use the Key Bridge regardless if the Canal Road entrance or the Prospect Street entrance is being used. The only change is in the possible routing in the immediate vicinity of the Georgetown University. There will be no change to the total number of vehicle trips, nor to the origin or destination of the trips. Therefore, there should be no effect on the outer reaches of these trips.

We believe that these trafiic analyses address your request to study the traffic impacts of the proposed entrance improvements and signalization on the surrounding community as defined by the boundaries in your November 4, 1996, letter and trust this will allow for your agency's continued support for the project.

B. We would also like to respond to Ms. Deborah Price's letter, dated February 23, 1998, to Mr. James Sinnette, of the Eastern Federal Lands Highway Division, of the Federal Highway Administration, which commented on a portion of the traffic analyses mentioned in the previous section. That letter made the following three requests:

1. That the FHWA expand the project area and perform additional traffic analysis as requested in November of 1996.

This comment has been addressed above.

2. That the year 2016 analysis include, as an assumption, the construction of an additional 3.8 million square feet of university, as proposed in the Campus Plan.

The year 2016 analysis does include, as an assumption, the potential University expansion of 3.8 million square feet by the year 2010. Our analysis assumes a liberal background traffic growth rate that was recommended by the DCDPW in 1993 covering increases in traffic from all sources. This results in a 19 percent increase in traffic on Canal Road for the design year 2016. The potential University expansion is for additional dormitories, increased laboratory and library space, and to improve other crowded work spaces. The number of parking spaces on the south campus is capped by the DC Board of Zoning Adjustments. The existing parking spaces are used to capacity and no net additional parking spaces are planned to be constructed with any expansion. Therefore, no increase in vehicles accessing the South Campus is expected because they would have no place to park during the critical periods of our analysis. Our EIS only focusses on the impacts resulting from a change in access to the University; our proposed project does not increase traffic onto the campus, but merely redistributes the travel paths. It assumes the development of the University would occur with or without our entrance project.

3. That the FHWA provide an interpretation as to whether the level of service reduction at the Foxhall Road/Reservoir Road intersection in the 2016 AM peak and at the Foxhall Road/MacArthur Boulevard intersection in the 1998 PM peak is inconsistent with the Congressional intent that the project not result in a decrease in efficiency of any Federal-aid primary highway.

Our network analysis is primarily intended to determine the impacts to Canal Road which was the Federal-aid primary route alluded to in the legislation. We extended the limits to the west in response to local citizen concerns there as well. The decrease from LOS D to LOS E at the Foxhall Road / Reservoir Road intersection in the 2016 AM Peak is due to an increase in average vehicle delay of 0.2 seconds at that intersection. This increases the delay from 39.8 seconds to 40.0 seconds. The upper limit for LOS D is 40 seconds. There is no LOS decrease at Foxhall Road / MacArthur Boulevard. Note again that Foxhall Road, Reservoir Road, and MacArthur Boulevard are not Federal-aid primary highways and therefore any LOS decrease there would not conflict with the congressional intent that the project not decrease the efficiency of a Federal-aid primary highway.

4. That the FHWA provide additional analysis of the proposed 120 foot eastbound lane and its impacts on lane width and surrounding land use.

The FHWA is currently studying the 120 foot eastbound turning lane on Canal Road at the Whitehurst Freeway intersection. This study will be coordinated with DCDPW to ensure that adequate lane widths are proposed. The steep bluffs north of Canal Road will not be impacted by any work at this intersection. The FHWA is studying two alternatives. One alternative would not impact any existing retaining walls or the C&O Canal, but would result in narrower lanes. The other alternative may result in some construction modifications to the retaining wall at this intersection. The DCDPW will be consulted to determine lane widths and other requirements before any proposal to add an eastbound turning lane is included in the Final Environmental Impact Statement. Any modifications at this intersection will be incorporated into the Canal Road construction project.

C. Finally, we would like to respond to comments made by members of your staff at a May 13, 1998, meeting at DCDPW offices and which are detailed in the June 3, 1998, memorandum from Mr. David A. Devine to Mr. Kenneth G. Laden of DCDPW.

1. Construction impacts

The construction impacts are shown accurately in the plan sheet provided to DCDPW. In addition, the impacts will be discussed in the Final Environmental Impact Statement. Every attempt has been made to minimize impacts. Compared to the underpass, overpass, and signalized alternatives presented in the Draft Environmental Impact Statement, the revised signalized alternative has less impacts. All street lights and utilities that are impacted by any proposed work will be relocated as part of the construction project. All costs will be paid with project funds. The relocation design will be completed as part of the detailed design process.

2. Signal warrants

An analysis of the 11 Signal Warrants from the Manual on Uniform Traffic Control Devices (MUTCD) is attached. The proposed intersection would satisfy Warrant 2, Interruption of Continuous Traffic; Warrant 7, Systems Warrant; Warrant 9, Four Hour Volumes; and Warrant 11; Peak Hour Volume.

3. Canal Road Traffic

The network analysis (p.17,20) and other traffic studies performed indicate that further noticeable delays will not occur on westbound M Street, Whitehurst Freeway, and Key Bridge. During the AM Peak in 1998 and 2016, traffic will be prohibited from leaving the Canal Road entrance and turning eastbound on Canal Road, so traffic on eastbound Canal Road will not be stopped by the new signal. Traffic turning left from eastbound Canal Road into the university would have adequate storage in the new left turn lane. The network analysis confirms that eastbound traffic on Canal Road would not be adversely affected by the proposed project.

Based on the network analysis, during the 1998 PM Peak, the travel time from Reservoir Road to Key Bridge increases by a small amount in the eastbound direction. In the 1998 PM Peak, the increase is 48 seconds over the no-build travel time of 844 seconds. This is less than a 6% increase. In the 2016 PM Peak, the increase is 2 seconds over the no-build travel time of 2435 seconds, which is negligible.

4. Westbound Canal Road

Based on the network analysis, the travel time from Key Bridge to Reservoir Road does not appreciably change as a result of the proposed project. The proposed signal timing at the new intersection minimizes the stop time of westbound and eastbound Canal Road traffic to minimize impacts as much as possible on Canal Road.

5. Canal Road Volumes

The Canal Road traffic volumes were taken in 1993, prior to the Whitehurst Freeway construction. These counts showed an ADT of 57,000 on Canal Road. Again, our traffic analyses indicate that the proposed project will not have a noticeable negative traffic effect on Canal Road traffic.

6. Eastbound right turn lane at Whitehurst Freeway

Refer to the above discussion on Ms. Deborah Price's letter (item 4).

7. Future Meeting

The FHWA is available to meet with DCDPW BTS staff, at your request, to discuss any aspect of the project.

8. Project Benefits

As discussed in the Draft Environmental Impact Statement, improving the Canal Road entrance would reduce traffic headed from the University to Prospect Street and other residential streets east of the University. Improving the Canal Road entrance would also focus access to the South Campus by means of a more appropriate arterial roadway system rather than a local residential street system. Please refer to the traffic analysis on intersections east of the University discussed above, which quantifies the traffic benefits to streets east of the University. Approximately 78 vehicles (26%) during the AM peak period and about 200 vehicles (43%) during the PM peak period would be diverted from the Prospect Street entrance to the Canal Road entrance under the build scenario.

The following two items were discussed at the May 13, 1998, meeting, but not included in the June 3, 1998, memorandum.

1. Turning Templates. The drawing of the proposed alternative is conceptual. Based on a design vehicle WB-40, the lanes at the turn onto Canal Road would be widened to 16 feet. This would require that the retaining wall be approximately 100 feet long and 9 feet high. At the turn onto the existing entrance, we could widen the lanes to 16 feet. These details would be developed during the design process.

2. Prohibiting Left Turns During the AM. Electronic signs could inform people using the intersection of the turn restriction on Canal Road. These details would be worked out in coordination with DCDPW during the design process.

We appreciate your comments and trust that our response satisfies your concerns. We will send you a copy of the final draft of the Final Environmental Impact Statement when it is completed.

Sincerely,

Edward A Sheldell

for James A. Cheatham
Division Administrator

Enclosures (to addressee only)

cc: Ms. Deborah Price, DPW, DDOT
Mr. Maurice Keys, OPP
Ms. Karen Benefield, BTS
Mr. Don Goffredi, DECA, BTCS, DED
✓ Mr. Jim Sinnette, EFLH
Mr. Gary Burch, DECA

RECEIVED
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HDR-ALEX

August 14, 1996

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

'96 AUG 20 P12:14

Dear Mr. Griffith:

On July 31, 1996, representatives of the Federal Highway Administration met with National Capital Planning Commissioner Margaret Vanderhye to informally discuss the status of the proposed Georgetown Entrance Road project. The main focus of the conversation was to discuss our review of the three alternatives proposed in the November 9, 1995, National Capital Planning Commission (NCPC) letter, and the Federal Highway Administration's July 29, 1996, response.

During the course of these discussions, Commissioner Vanderhye asked for additional information on two items. The first item is a variation of the District of Columbia Department of Public Works proposal. Since the construction of a parallel road accessing a "jug handle" at the Foxhall/Canal road intersection is so destructive to the palisades, Commissioner Vanderhye suggested that just the "jug handle" be constructed at the intersection. All vehicles exiting the Georgetown University would turn right (westbound) on Canal Road. The approach to the Foxhall/Canal Road intersection would be modified to allow those persons with the destination of Key Bridge, Whitehurst Freeway, or points east of the university to utilize a ramp on the right side of Canal Road to bring them in as a new, separate leg to the existing Foxhall/Canal Road intersection (the ramp being the "jug handle").

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The second item the Commissioner asked for was additional information on the impact of the proposed traffic signal for Alternative 2 or Alternative 2A. The specific concern to be addressed is whether proposed signal will cause the westbound traffic on Canal Road to hinder the operations of the Key Bridge/Whitehurst Freeway intersections due to stacking of vehicles during the afternoon/evening peak rush hours.

The Federal Highway Administration has reviewed the traffic operations for both of these items and have concluded the following:

1. The proposed jug handle does not fully address the purpose and need of this project since it only accommodates those persons exiting the university to access eastbound Canal Road. To fully address the purpose and need of this project, there still needs to be accommodation of the eastbound Canal Road users wanting to access the university. For analysis purposes, the jug handle has been coupled with Alternative 2 and Alternative 2A in order to accommodate the left turn access into the university.

2. The jug handle will adversely impact the flow of traffic through this area. While this concept alleviates stopping traffic for those exiting the university to eastbound Canal Road, the jug handle reduces the available signal green time for all of the existing movements at the Foxhall/Canal Road intersection, and it will require the existing free flowing movement from westbound Canal Road to Foxhall Road to stop. The result of these impacts is actually worse than the impact of installing an additional signal. Enclosed is a chart showing the volume to capacity ratios for the no-build and for Alternative 2 and 2A with and without the jug handle. The resultant volume/capacity ratios for Alternative 2A are slightly better than Alternative 2 due to a small percentage of the left turn movements still being assigned to Prospect Street.

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