

David Avitabile davitabile@goulstonstorrs.com 202-721-1137 Tel

April 4, 2011

VIA HAND DELIVERY

Mr. Anthony Hood, Chairman Zoning Commission 441 4th Street, NW, Suite 210 Washington, DC 20001

Re: Z.C. Case No. 06-11A/06-12A – GW Square 103
Supplemental Post-Hearing Statement of the University

Dear Chairman Hood and Members of the Commission:

In response to WECA's submission dated March 23, 2011, the applicant, The George Washington University ("University"), submits the following responses:

1. **DDOT** Site Visit.

In its March 1, 2011 post-hearing report, DDOT clearly stated that the site visit and related comments did not represent "a formal assessment in any way" of the project, and "should not be recorded as official DDOT review."

2. WECA's "Option 4."

In its March 1, 2011 post-hearing report, DDOT generally addressed why a one-way alley operation in <u>either</u> direction was not appropriate for this project. The University offers the following additional factual support—already in the record of this case—for why a one-way westbound circulation plan (WECA's "Option 4") would be undesirable:

First, WECA erroneously states that Option 4, the one-way westbound circulation pattern, would avoid circuitous traffic. This is incorrect, as demonstrated in the traffic reports prepared by the University's traffic expert. WECA mistakenly relies on an assumption that traffic related to the GW facility will follow the general commuter pattern, which is to enter from the south in the morning and exit to the south in the afternoon. The trip generation directional distribution for the proposed parking garage, however, clearly shows GW traffic does not follow this pattern; rather, a considerable percentage of GW traffic actually enters from the north in the

AM and departs to the north in the PM. Therefore, there will be a significant amount of circulating "around the block" if the alley is one-way, regardless of the direction.

Any scenario that forces vehicles to exit from the garage onto a one-way road – whether it is a one-way alley or the one-way G Street – will result in a significant percentage of the exiting traffic going around the block and creating additional pedestrian/vehicle conflicts.

Second, WECA's alternative would place all vehicular traffic on the intersection of 21st Street and the alley during the PM peak hour – the very intersection that WECA challenged at the hearing because the intersection would operate at a LOS "F" for all traffic exiting the alley. "Option 4" would worsen conditions at this 21st Street and alley intersection with increased delays and queues, because all drivers would be forced to use the 21st Street exit – including the large percentage of drivers who want to go north or west, as described above. Under the University's proposed two-way alley scenario, the drivers have the option to use either end of the alley, and only those drivers that are headed to the south or east (again, only about half) would experience the delay.

Conclusion

On balance, the University continues to believe that the most optimal location for vehicular access is from the two-way public alley, and this option is fully supported by DDOT's own detailed analysis of all four alternatives. As set forth above and in prior submissions, the Project meets the criteria for approval under the Zoning Regulations. If you have any questions regarding this application, please feel free to contact Maureen at 202-721-1101 or David at 202-721-1137.

Sincerely.

Maureen Dwyer

A

David Avitabile

DA/da Enclosures

cc:

Charles Barber

Alicia O'Neil Knight

CERTIFICATE OF SERVICE

On April 4, 2011, I caused a copy of the foregoing letter and enclosure to be delivered by hand or by U.S. Mail to the following:

Jennifer Steingasser
Deputy Director, Development Review and
Historic Preservation
D.C. Office of Planning
1100 4th Street, SW, Suite E650
Washington, DC 20024

Jeff Jennings
Policy and Planning
District Department of Transportation
2000 14th Street, NW, 7th Floor
Washington, DC 20009

Advisory Neighborhood Commission 2A West End Branch Library 1101 24th Street, NW Washington, DC 20037 Foggy Bottom Association PO Box 58087 Washington, DC 20037-8087

West End Citizens Association c/o Barbara Kahlow 800 25th Street, NW #704 Washington, DC 20037

David Avitabile