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April 12, 2007

BY E-MAIL

Public Space Committee
District Department of Transportation
941 North Capitol Street, N.E.
Room 2100
Washington, D.C. 20001

Re: Application # 24599; 2660 Woodley Road, N.W.

Dear Commissioners:

The Woodley Park Community Association¹ (WPCA) opposes the application of The JBG Companies for a curb cut for a new driveway at its Marriott Wardman Park property. This curb cut would be in addition to the three that already exist for this property on this one-block stretch of Woodley Road and would bring the total number of curb cut for this property to eight. This application should be denied for the same reasons that this Committee denied JBG's application last August that included this same curb cut.

In Application # 16576, dated November 29, 2005, JBG asked for permission to create two additional curb cuts along Woodley Road, one of them identical to the one sought in Application # 24599 and another one a block further west. Although DDoT had no objections, this Committee denied that application, and did so without a single dissenting vote.² The Committee decision was in large part based on a study that JBG had commissioned to analyze existing traffic conditions at this site and traffic conditions when its proposed development is completed. That study concluded that JBG's project would increase the number of vehicle-trips during peak times of the day by only one or two percent.³ DDoT agreed with that conclusion.⁴

The Committee concluded that this minimal increase in traffic volume could not justify adding to the number of driveways for this property. The Chair of the Committee explained,

¹ WPCA is a DC a not-for-profit membership corporation organized to maintain and advance the quality of the Woodley Park area, in which the property in question is located. WPCA has approximately 700 individual members, all residing in the immediate neighborhood of this property. Its resolution opposing this application is Attachment 1.

² The Committee did grant JBG permission to relocate the entrance driveway to the Hotel and to use the old entrance temporarily during construction on the property. But that driveway will be "permanently closed after construction."

³ Wells & Associates, *Wardman Park Traffic Impact Analysis*, Washington, D.C., January 16, 2006, at 5 (a copy of the relevant pages is Attachment 2).

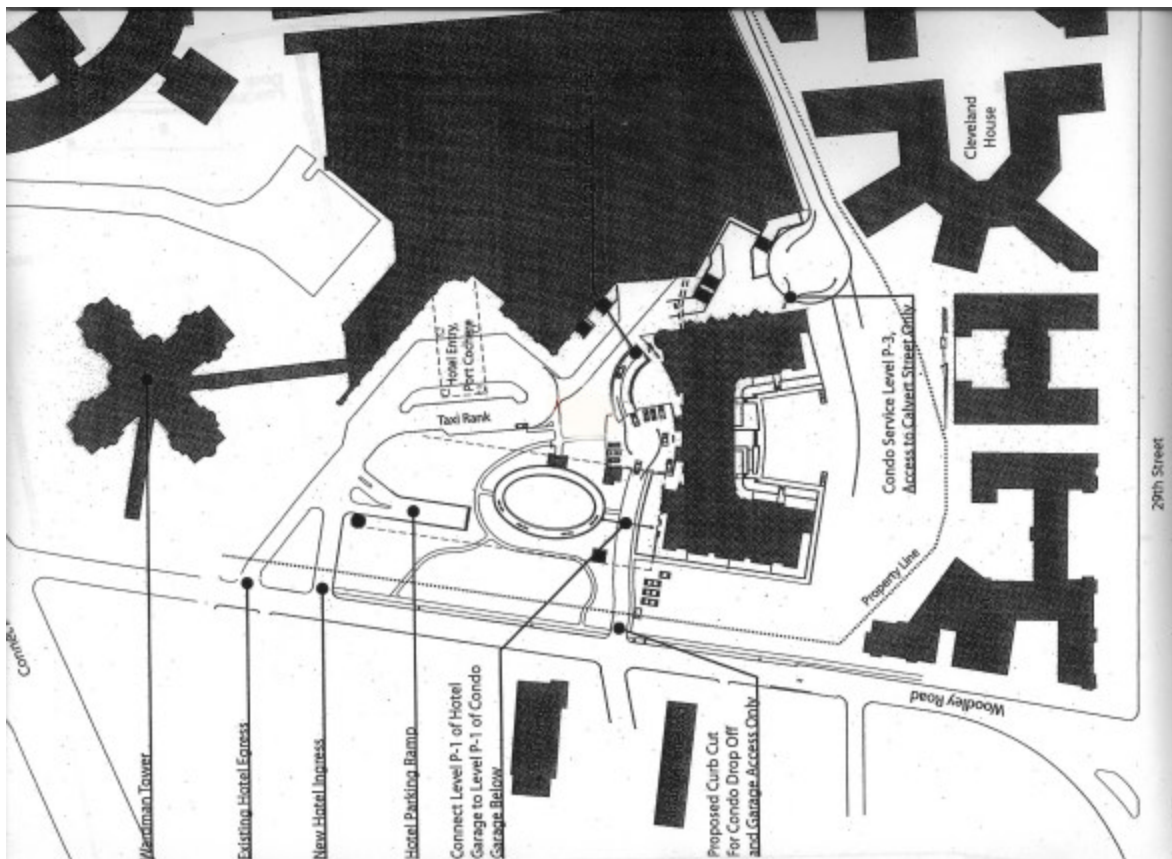
⁴ Memorandum from Kenneth G. Laden to Lennox Douglas, March 31, 2006, at 2.

“I share the comments made by Mr. Douglas relative to these curb cuts. I don’t think the applicant has made a convincing argument that the public interest is benefited by the construction of these two curb cuts. I think the applicant has not made a case that the matter of right development is going to increase the density of vehicle traffic. In fact, they have stated largely that that volume is going to be largely consistent with that which is currently there. While certainly the evidence exists that it’s not an optimal situation, I’m not convinced that that which is proposed is, in fact, the optimal solution either.”

Recording of Public Space Committee hearing of August 24, 2006, part 2, minute 52.⁵

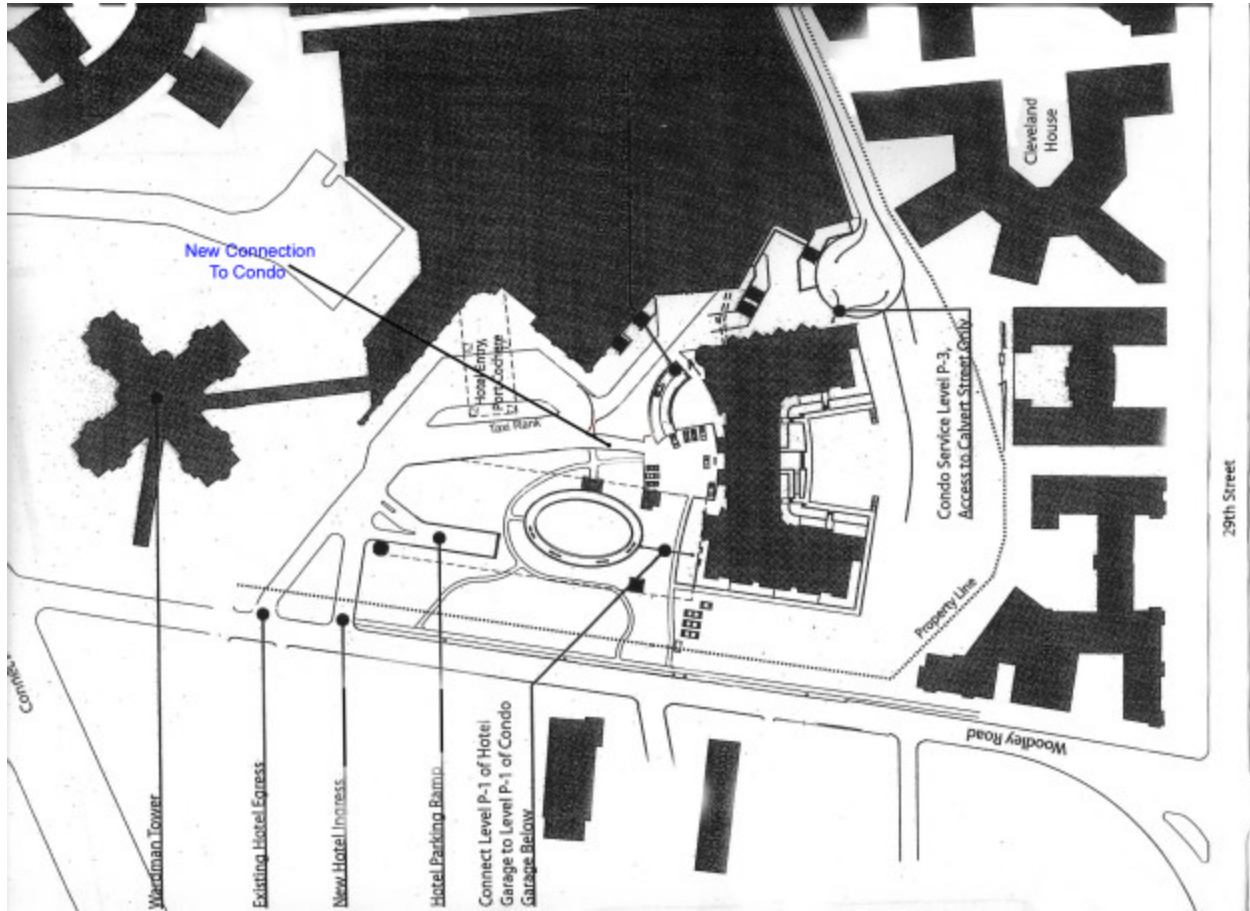
In this respect, nothing has changed since the last time JBG was before the Committee. It is still asking for additional use of public space even though the volume of traffic will not be increased. This fact, which caused the Committee to deny JBG’s application last year, should cause it to deny this one as well.

Not only is this new curb cut not needed to handle the volume of traffic, it is also not needed to provide access to JBG’s proposed condo addition. JBG can easily use its existing driveways to do that. This picture, provided to WPCA by JBG, shows the property and the proposed new curb cut on Woodley Road opposite 27th Street.



⁵ Mr. Douglas had noted that the proposed condo buildings would not increase the occupancy load on the site. *Id.* at minute 41.

This next picture eliminates that new curb cut and shows how the driveways and roadways that exist today on the property can easily be modified to accommodate the addition of the condo.



A short extension of roadway can bring traffic to the condo's front door and garage, without the need of an additional curb cut and long driveway from the street. This approach also has the benefit of preserving the unbroken expanse of green space along Woodley Road from the Hotel entrance driveway all the way the 28th Street.

Not only is the proposed curb cut unnecessary, its addition and its placement directly across from 27th Street are a bad idea.

This block of Woodley Road, just west of Connecticut Avenue, is a busy pedestrian street. Residents walk to and from the Metro and buses on the corner and the shops and restaurants on the Avenue. Children and their parents walk to and from the Aidan Montessori School at one corner of 27th Street and Woodley Road and parishioners walk to and from St Thomas Apostle Church on the other. This block is also on the route to the Oyster Elementary School and the Maret School. The proposed curb cut would force these pedestrians to cross four driveways exiting from the Marriott Wardman Park property in this one block. There can be no question that the proposed driveway will dangerously interrupt and threaten pedestrian traffic along Woodley Road.

Furthermore, placing this new driveway directly across from 27th Street will encourage residents of the proposed condo addition to use narrow residential neighborhood streets, such as 27th Street

and Garfield Street, to get to their building. JBG's plans for the condo submitted to DCRA in connection with its application for a building permit # 17888 show more than 120 units and garage for more than 200 residents' vehicles. The Committee should not grant an application that would put more traffic on these local streets.

The use of 27th Street by all these additional vehicles is of particular concern because of the presence of the school on the corner of 27th Street and Woodley Road, especially during the busy drop-off and dismissal periods. The head of that school has explained, "We are not in favor of the curb cut since it would continue 27th Street and create an extremely dangerous intersection on a through street with a great deal of traffic serving the community as well as the hotel business."⁶

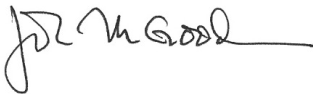
These facts demonstrate that JGB's proposed occupation of public space would both endanger the public and substantially interfere with both pedestrian and vehicular traffic and require rejection of JGB's applications.

JGB apparently wants this additional driveway in order to separate hotel traffic from condominium traffic. There is no reason, however, why JGB cannot accomplish this separation on its own 16-acre property. JGB does not need to use more public space and build another driveway, with all the accompanying dangers and dislocations, to do so.

The application fails to meet the criteria for allowing private use of public space that are prescribed in the regulations. The proposed additional use would both substantially interfere with pedestrian and vehicular traffic and endanger the public. Either fact alone is sufficient to require rejection of the applications. Moreover, because there are no public benefits to counterbalance these public harms, the applications, therefore, also fail the regulation's more general "public interest" test.

"The goal of Public Space Management is to achieve and maintain safe and beautiful streets."⁷ The use of public space proposed by JGB would make Woodley Road both more dangerous and less beautiful. Permitting it would defeat DDoT's goals. For all these reasons, the Committee should deny JBG's applications.

Yours truly,



John M. Goodman
President, Woodley Park Community Association

Copy for Ms Ann Simpson-Mason
 Ms Denise Wiktor
 Ms Nancy MacWood

⁶ Letter from Kathleen M. Minardi, Head, Aidan Montessori School, to DDoT, dated March 27, 2007.
⁷ <http://ddot.dc.gov/ddot/cwp/view,a,1255,q,563937,ddotNav,|32397|.asp>.

ATTACHMENT 1

RESOLUTION

WHEREAS The JBG Companies have filed application #24599, dated January 2, 2007, for an additional curb cut and driveway for access to the Marriott Wardman Park Hotel property, located at 2660 Woodley Road NW, and for street tree removal to construct that additional driveway; and

WHEREAS no construction permit has been issued to build a building that would be served by the proposed curb cut; and

WHEREAS the Woodley Park Community Association (“WPCA”) has reviewed the application and the traffic study commissioned by JBG in connection with this project, which study finds that JBG’s proposed development would result in only a negligible increase in traffic entering and exiting this property; and

WHEREAS JBG does not need an additional driveway to handle the volume of traffic to its property; and

WHEREAS JBG has ample space on its 16-acre property to handle traffic circulation and to separate traffic for its proposed condominium tower from traffic for its hotel; and

WHEREAS, as evidenced by building plans filed by JBG with DCRA, JBG plans to co-mingle Hotel and condominium traffic by reserving 99 spaces in the condominium garage for Hotel use; and

WHEREAS the section of Woodley Road where the additional driveway is sought is a busy street, with both heavy pedestrian and vehicular traffic; and

WHEREAS the proposed driveway would align with 27th Street NW where a Church and an elementary school are located; and

WHEREAS DDoT designated 27th Street NW for one-way traffic in order to relieve the excessive cut-through traffic from the existing hotel; and

WHEREAS the addition of a driveway will interfere with both pedestrian and vehicular traffic; and

WHEREAS the location of the proposed driveway will encourage drivers to utilize neighborhood streets, such as 27th Street and Garfield Street, for direct access to the proposed driveway; and

WHEREAS the addition of a driveway will endanger the public; and

WHEREAS the addition of a driveway is not in the public interest:

THEREFORE, the Woodley Park Community Association opposes additional driveways for this property along Woodley Road, such as the one sought in application #24599, dated January 2, 2007, and

BE IT FURTHER RESOLVED that Woodley Park Community Association asks the Public Space Committee of the District Department of Transportation to deny this application.

Dated: March 12, 2007

ATTACHMENT 2

**WARDMAN PARK
TRAFFIC IMPACT ANALYSIS
WASHINGTON, D.C.**

Prepared for:
Wardman Hotel, L.L.C.
and
Wardman Cotillion Residential, L.L.C.

Prepared by:
Wells & Associates, LLC

January 16, 2006

The conclusions of this traffic impact study are as follows:

1. *The Wardman Park project is located within a connected transportation network that provides regional and local accessibility by private vehicle, public transportation, walking, and bicycle.*
2. *Wardman Park also is served by four (4) Metrobus lines on Calvert Street and five (5) Metrobus lines on Connecticut Avenue. Taxi service is prevalent in the Woodley Park area, specifically along Connecticut Avenue and at the Marriott Wardman Park Hotel.*
3. *Critical movements at the STOP controlled intersections in the study area currently operate at acceptable levels of service during the AM and PM peak hours, with the exception of the southbound turning movements from the Park Tower garage onto Calvert Street. The signalized intersections operate at overall acceptable levels of service during both the AM and PM peak hours. The westbound and northbound approaches at the Connecticut Avenue/Calvert Street intersection, however, operate at LOS "F" during the AM peak hour.*
4. *Without the Wardman Park redevelopment, critical movements at the STOP controlled intersections in the study area would operate at acceptable levels of service during the AM and PM peak hours, with the exception of the southbound turning movements from the Park Tower garage onto Calvert Street, similar to existing conditions. The signalized intersections would operate at overall acceptable levels of service during both the AM and PM peak hours, with the exception of the Connecticut Avenue/Calvert Street intersection which would operate at LOS "E" during the AM peak hour. The westbound Calvert Street approach and the northbound Connecticut Avenue approach would continue to operate at LOS "F" during the AM peak hour.*
5. *The Wardman Park re-development project would upon completion generate an estimated 333 AM peak hour vehicle-trips and 388 PM peak hour vehicle trip. These future uses would generate four (or one percent) more AM peak hour vehicle-trips, and seven (or two percent) more PM peak hour vehicle-trips than the existing hotel use.*
6. *The levels of service at the study intersections would operate at similar levels of service during the AM and PM peak hours with or without the Wardman Park re-development.*
7. *The on-site vehicle queues that occasionally extend onto Woodley Road and also onto Connecticut Avenue are anticipated to lessen with the construction of the re-configured hotel access (two lanes inbound and outbound on-site), the underground parking garage, direct access to the Wardman West and Park Tower garages, and improved traffic management.*