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June 16, 2006

BY EMAIL

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

Re: 2660 Woodley Road, N.W.

Gentlemen:

The Woodley Park Community Association¹ (WPCA) opposes the applications of The JBG Companies for two new permanent driveway curb cuts — in addition to the three that already exist — to provide access to JBG's Marriott Wardman Park property on a two-block stretch of Woodley Road.² These applications fail to meet the criteria for allowing private use of public space that are prescribed in the regulations.³ The proposed additional uses would both substantially interfere with pedestrian and vehicular traffic (including decreasing parking along Woodley Road) 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.

Earlier this year, WPCA members wrote to the Acting Director of DDoT describing some of the serious problems that would be caused by JGB's proposed use of public space. These include:

- the threat to traffic and pedestrian safety posed by curb cuts,
- the added threat caused by the slope and grade of the driveway proposed for the entrance to the condominium tower garage and the off-center placement of one of the curb cuts, and

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 800 individual members, all residing in the immediate neighborhood of this property.

² JGB is asking for two new permanent driveways for its proposed condominium tower, for permission to move the existing hotel in-bound driveway, and for permission to use the existing inbound driveway for construction vehicles. One of the existing driveways on Woodley Road provides access to a single building (the Wardman Tower). Two driveways provide access to the property generally.

³ See 24 DCMR § 100.1 and Attachment 1.

the fact that the curb cuts will reduce the amount of on-street parking in an area that is already overcrowded.⁴

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.

But these applications suffer from a more fundamental fatal defect. This is that there is no private need — and certainly no public need — to double the number of curb cuts along a two-block stretch of Woodley Road that provide access to this property. Late last year, JGB commissioned a study to analyze existing traffic conditions at this site and traffic conditions when the proposed development is completed. While WPCA might not agree with all the conclusions in the study, it is important in the context of these applications that JGB's study concludes that this project would increase the number of vehicle-trips during peak times of the day by only one or two percent.⁵ DDoT agrees with this conclusion.⁶ This minimal increase in traffic volume cannot justify doubling the number of Woodley Road driveways for this property.

JGB apparently wants these additional driveways 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 additional driveways, with all the accompanying dangers and dislocations, to do so.

Woodley Road is a relatively small local street — parking on both sides and just one lane of traffic in each direction. And yet the most recent data from DDoT show that this is a heavily trafficked street — in fact, there is more traffic on this street than there is on many much wider neighborhood thoroughfares.⁷ Adding two more driveways to the three that already exist on this two-block stretch of Woodley Road would only further slow traffic on this busy street.

JGB made several presentations to WPCA about its development plans for the Marriott Wardman property. These presentations included traffic flows onto and off of the property and the driveways proposed by JGB. After these presentations, WPCA held a special meeting on April 5, the sole purpose of which was to consider JGB's proposal and to vote on competing resolutions which took different position on it. At that meeting, WPCA voted 86 to 20 to oppose the proposed driveways.⁸

Finally, some commentators believe that WPCA's opposition to these curb cuts is an effort to force traffic to use Calvert Street instead of Woodley Road.⁹ This is not WPCA's intent, and, more important, it would not be the effect of denying these applications. WPCA wants JGB to route the traffic for its proposed condominium tower on its own property, using the driveways that already exist along Woodley Road, and not use multiple extra driveways across the sidewalk.

⁴ Letter from Elizabeth Franklin to Michelle Pourciau, March 21, 2006, a copy of which is Attachment 2.

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

⁶ Memorandum from Kenneth G. Laden to Lennox Douglas, March 31, 2006, at 2.

⁷ See http://ddot.dc.gov/ddot/frames.asp?doc=/ddot/lib/ddot/information/maps/2002_citywide.pdf.

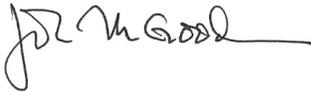
⁸ A copy of this resolution is Attachment 4.

⁹ Emails from Cristle Humes (worried that Calvert Street would become the sole exit without the new curb cuts), Esta Rosenberg (curb cut opponents want to force all the condominium traffic onto Calvert Street) and James Burdick (Committee should not make Calvert Street the sole access to the condominium).

WPCA is not saying that this traffic, or any other traffic generated by this project, should be routed via Calvert Street rather than Woodley Road. In fact, it is JGB's proposed western-most driveway that will force traffic to exit onto Calvert Street, further exacerbating traffic and pedestrian issues on that thoroughfare.

DDoT correctly states, "The goal of Public Space Management is to achieve and maintain safe and beautiful streets."¹⁰ 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 JGB's applications.

Yours truly,

A handwritten signature in black ink, appearing to read "John M. Goodman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John M. Goodman
President, Woodley Park Community Association

¹⁰ <http://ddot.dc.gov/ddot/cwp/view,a,1255,q,563937,ddotNav,|32397|.asp>.

ATTACHMENT 1

The Legal Standard for Granting Requests To Use Public Space

The DC Municipal Regulations prescribe what an applicant must show in order to be granted permission to use public space:

“Occupation of public space beyond the extent permitted by existing law or regulation, or as those laws or regulations may be amended from time to time, is hereby forbidden. The Mayor, however, may authorize the issuance of a permit for a use of public space directly connected with and subordinate to another use of that space which is specifically permitted by some other law or regulation, if the Mayor, on the recommendation of the Public Space Committee, finds that the proposed additional use will not adversely affect the public interest or violate any of the following criteria:

- “(a) The proposed additional use will not endanger the public;
- “(b) The proposed additional use will not substantially interfere with pedestrian or vehicular traffic; and
- “(c) The proposed additional use will not increase the area of public space that the applicant for the permit is authorized to use by other law or regulation.”¹

The burden is on the applicant to prove, and the Public Space Committee must find, that the proposed use of public space meets this standard. If the applicant does not carry this burden, then the application must be denied.

This regulation is simple to apply. First, an application must be denied if it fails any one of the criteria (a) through (c) — if granting it would endanger the public, or substantially interfere with pedestrian or vehicular traffic, or increase the area of public space that the applicant for the permit is authorized to use by other law or regulation. If any one of these criteria would be violated, the application may not be granted.

This part of the regulation does not require — or permit — any consideration of other factors or any balancing of competing interests. If the proposed use of public space violates any one of the three criteria, the inquiry is over and the application must be denied.

If all three criteria are satisfied, and only if they are all satisfied, the question becomes whether the proposed use of public space adversely affects the public interest. To answer this question, the public benefits must be balanced against the public harms. Private benefits to the owner of the property do not figure into this public interest analysis. If there are real public harms and the only benefits are those that accrue to the owner of the property, then the harms outweigh the benefits, no matter how great the private benefits are.

¹ 24 DCMR § 100.1.

ATTACHMENT 2

Elizabeth Franklin

2800 Woodley Road, N.W., #544

Washington, D.C. 20008

(202) 462 6082

March 21, 2006

Ms. Michelle Pourciau
Acting Director
District Department of Transportation
Government of the District of Columbia
Frank D. Reeves Municipal Center
2000 14th Street N.W.
6th Floor
Washington, D.C. 20009

Re: Opposition to Curb Cut Application by Marriott Wardman Park/the JBG Companies

Dear Director Pourciau:

This letter conveys the strong opposition of a large number of Woodley Park Community residents, some of whom have signed below, to the pending curb cut applications for the Marriott Wardman Park project. Below please find the text of a referendum voted upon by members of the Woodley Park Community Association (“WPCA”) at a WPCA Special Meeting on March 9, 2006, held in accordance with the WPCA By-Laws. Additionally, this letter details the opposition of the Woodley Park Community and its residents to these curb cut applications. We hope the D.C. Department of Transportation will provide our concerns all due consideration, and we look forward to your response. Furthermore, this letter serves as a formal request for a meeting with you and other decision makers in the D.C. Department of Transportation. We trust you and your staff will be able to meet with us in the very near future to address the significant concerns we raise below.

I. Overwhelming Vote in Opposition of Curb Cuts at Special Meeting of the Woodley Park Community Association

The members of the WPCA voted overwhelmingly to oppose all applications by the JBG Companies for curb cuts along Woodley Road at the Wardman Park Marriott/JBG Companies existing development site. It is our understanding that the D.C. Department of Transportation is currently reviewing curb cut applications for this property. This letter serves to advise you of the community’s strong and intense opposition to these applications as evidenced by a 64-1 vote in opposition to the curb cut applications. Specifically, the members of the WPCA are opposing the pending curb cuts because of significant concerns related to (1) public and pedestrian safety; (2) increased vehicular traffic; (3) reduced parking supply; and (4) environmental impacts.

The referendum, as adopted with 64 votes in favor, 1 in opposition, and 4 abstentions, states:

The Woodley Park Community Association opposes any and all new curb cuts/driveways as well as any and all applications for curb cuts/driveways and street tree removals at the Marriott development site on Woodley Road, N.W.

II. Delay Decision Until Other Legal Issues Resolved

First, we urge the D.C. Department of Transportation to delay final consideration of any curb cut application related to the Marriott Wardman Park Project until other agencies of the D.C. Government rule on pending issues. We understand that zoning issues have not been resolved for this site and that environmental impact screenings have not been completed for this site. The zoning issues are significant, because the developer is attempting to construct the condominium building as a matter of right. However, according to the D.C. Department of Consumer and Regulator Affairs' Zoning Administrator, Bill Crews, there is uncertainty regarding whether the project can be developed as a matter of right, due to the mixed use of the site (hotel/commercial and residential). Additionally, specific aspects of the building's connection to the existing hotel, the relocation of the existing hotel loading berths, and the measuring point to establish the height of the new condominium building are being questioned and examined by the ANC and the Zoning Administrator. A decision by the Zoning Administrator may preclude the need for the proposed curb cuts since the building might have a considerable reduction in height and density based on the Zoning Administrator's ruling. Thus, it is imperative that these outstanding issues be resolved before permanent curb cuts are considered by the D.C. Department of Transportation, given the inability of the D.C. Government to revoke an approved curb cut application.

III. Curb Cuts Threaten Public and Pedestrian Safety

As an initial matter, the Woodley Park Community is extremely concerned with the impact these proposed curb cuts will have on public and pedestrian safety, when driveways of similar width to Woodley Road are added to a segment of a block that is currently uninterrupted and safe for intense pedestrian circulation. Specifically, we believe that the proposed curb cuts pose major health and safety threats to (1) schoolchildren attending nearby schools; (2) parishioners at St. Thomas Apostle, (3) pedestrians walking to utilize public transportation, (4) pedestrians walking past steep slope and grade elevations at the proposed condominium garage, (5) drivers, due to the placement of the curb cuts, and (6) drivers and pedestrians due to vehicles traveling in excess of posted speed limits.

A. Threats to Schoolchildren

It is important for the D.C. Department of Transportation to note that three elementary schools, serving over 1,200 children and teenagers ranging from eighteen months to eighteen years of age, are in close proximity to the proposed curb cuts. These schools are the Oyster Bilingual School, Aidan Montessori School, and the Maret School. The Oyster Bilingual School has an enrollment of 421 students, and the Maret School has an enrollment of approximately 600

students. Aidan Montessori School, which is located across the street from one of the proposed curb cuts, has an enrollment of approximately 200 toddlers through early elementary grades.

Many of the children who attend these schools live in the neighborhood. Others, such as children who are in the upper grades at the Maret School take public transportation to Woodley Park and walk up Woodley Road to reach their final destination. In walking to the schools, they must walk along Woodley Road and utilize pedestrian crossings to cross Woodley Road at 27th and 28th Streets in order to reach these schools. The Maret School students involved in sports activities also travel along Woodley Road. The Maret School's cross country team regularly runs past the Marriott Wardman Park property and its proposed construction site. Additionally, many parents of children who attend Aidan Montessori School park on Woodley Road or 28th Street and walk their children to school, notwithstanding a drop-off area for children on 27th Street. The curb cuts, and the increased traffic they will allow to be diverted onto Woodley Road, pose substantial dangers for these schoolchildren who walk along Woodley Road and who must cross the streets and the proposed curb cuts. As a matter of fact, the proposed curb cut adjacent to the school and aligning with 27th Street will result in a potentially dangerous four-way intersection.

B. Threats to Parishioners of St. Thomas Apostle

The curb cuts also pose safety threats to parishioners of St. Thomas Apostle, who attend mass on Saturdays and Sundays and who may attend other meetings and gatherings at St. Thomas Apostle during the week (such as funerals, twice daily mass, confession, weddings, baptisms, Sodality lunches and dinners, bazaars, St. Thomas Players performances, and other social gatherings). Many of these parishioners are elderly and special attention must be paid to their needs, as many walk, some using canes, along Woodley Road. Extra consideration must be given as well to those in wheelchairs and parishioners with young children. Additionally, the apartment buildings along Woodley Road and 29th Street are home to elderly neighborhood residents who walk to special daytime programs, including luncheons and lectures that are held at the church.

C. Threats to Those Walking to the Metro

Woodley Road is a heavily traveled commuter and pedestrian route to the public transportation facilities located on Connecticut Avenue. Given the neighborhood's location near a Washington Metropolitan Area Transit Authority station ("Metro") and near numerous Washington Metropolitan Area Transit Authority bus stops, pedestrian traffic along Woodley Road is much greater than in most other Washington, D.C. neighborhoods. Woodley Park is a high-density neighborhood, and a majority of the residents of the homes, condominium and cooperative buildings, and numerous apartment buildings along 27th, 28th, 29th, Calvert Street, Garfield Street, Cathedral Avenue, and Woodley Road walk to the Metro along Woodley Road, the most direct pedestrian route to the Metro entrance and to the Metro elevator located on the corner of Woodley Road and Connecticut Avenue.

A large number of the Marriott Wardman Park's hotel guests as well as the guests of the Omni Shoreham Hotel (located a block away on Calvert Street) utilize the Metro for access to local restaurants and downtown museums and monuments. A large amount of tourists--including many parents with small children--are also pedestrians in our neighborhood, because they park on our community streets to visit the National Zoo and the National Cathedral, attend functions at the hotels, and dine in the restaurants and shop in the commercial establishments located along Connecticut Avenue. Unfortunately, tourists are not necessarily as savvy as neighborhood residents in realizing the imposing pedestrian dangers at neighborhood intersections, including the intersection of Woodley Road and Connecticut Avenue. For example, the proposed curb cut adjacent to the 2800 Woodley Road apartments and in close proximity to both the Aidan Montessori School and the St. Thomas Apostle Church poses great dangers to all pedestrians walking on the sidewalk. This proposed driveway will have steep slopes caused by the difference in grade elevations between the road and the site, and these differences will impede a driver's full visibility of pedestrians on the sidewalk.

The proposed curb cuts would force pedestrians to cross five driveways exiting from the Marriott Wardman Park property. The proposed new driveways associated with each petitioned curb cut are almost as wide (24 feet each) as Woodley Road (30 feet wide). The proposed curb cuts for each driveway are 45 feet wide each, and the owners of the property have confirmed that they intend to widen the existing driveways. There is no question that the proposed driveways will dangerously interrupt and threaten pedestrian traffic along Woodley Road. Throughout the three to four years of estimated construction, these pedestrians will have to navigate not only hotel traffic but also traffic of large construction vehicles. Pedestrians will continue to face these dangers after construction is complete, due to the array of vehicles--including service vehicles (such as moving trucks, trash trucks, delivery trucks, etc.)--that will be utilizing the proposed driveways. The dangers posed to these pedestrians by the proposed curb cuts should not be ignored by the D.C. Department of Transportation.

D. Threats Posed by Slope and Grade Elevation of Proposed Condominium Garage Entrance

Additionally, the proposed curb cut near 28th Street is planned for use by service traffic (trash trucks, moving trucks, and "back of house" garage entrance/exit). The slope and grade elevation differences between Woodley Road and the proposed internal street (connecting to Calvert Street) will threaten the safety of pedestrians. Vehicles coming out of this steep driveway to approach Woodley Road would not be able to see pedestrians in time to avoid a collision, making this an intolerably dangerous situation. At a recent ANC meetings, JBG noted that the driveway rises 18 feet over a 105 foot distance. Because there is no "apron" where the driveway is level before coming to the sidewalk, it will be difficult, if not impossible, for drivers to see pedestrians, especially smaller children. Also, the driveway is likely to have walls on either side, further restricting visibility. Furthermore, we question the right of very large service vehicles to utilize Woodley Road given the existing weight restrictions in place.

E. Threats Posed by Off Center Placement of Curb Cuts

Another safety issue concerns the location of the curb cuts. Two of the curb cuts are proposed directly across from the “T” intersection of Woodley Road and 27th Street and off center from the “T” intersection of Woodley Road and 28th Street. The most western curb cut will not align with 28th Street, posing potential safety issues. Additionally, vehicles traveling in both directions commonly exceed the speed limit along Woodley Road. Additional driveways at the Marriott Wardman Park site will increase the likelihood of an accident, as vehicles exiting turn in the path of cars speeding down Woodley Road. Furthermore, many cars make illegal u-turns at the intersection of Woodley Road and 28th Street (a one-way street) and at the intersection of Woodley Road and 27th Street (another one-way street). Given the proclivity of drivers to use these intersections to make an illegal u-turn, it is reasonable to assume that accidents will occur between those making illegal u-turns and those entering and exiting the proposed condominium garage near 28th Street.

F. Threats Posed by Speeding Cars and Increased Traffic on Woodley Road

As noted above, due to the current configuration of Woodley Road, many automobiles travel in speeds far exceeding the speed limit. We encourage the D.C. Department of Transportation to look into this matter when determining the issue of safety. If additional traffic is exiting from the Marriott Wardman Park property, as is planned, the potential for traffic accidents increases, given the speeding that currently occurs on Woodley Road.

IV. Curb Cuts Exacerbate Dire Traffic Conditions

With regard to traffic, the proposed curb cuts raise numerous issues that must be examined by the D.C. Department of Transportation. Based on our experience, we believe that areas within the Woodley Park Community, specifically Woodley Road, would qualify under the D.C. Department of Transportation’s guidelines for the implementation of traffic calming measures. Thus, we believe that the traffic along Woodley Road has already reached a serious situation, even without consideration of the new traffic that the proposed development will generate and that the curb cuts will facilitate if the curb cut applications are approved.

A. JBG Companies Should Bear Burden of Two Competing Uses on Their Property

As an initial matter, we understand that the JBG Companies (“JBG”) is requesting these proposed curb cuts in an attempt to separate its residential condominium traffic from its hotel traffic. However, we do not believe that this furthers any reasonable governmental goal. It merely allows for a preferred commercial use by the developer. The separation of residential traffic from hotel traffic outside the boundaries of the large tract of property does not generate any traffic benefits for the neighborhood. Consequently, this separation should not be utilized as a basis for supporting the curb cut application. Instead, JBG should bear the burden of developing two competing uses within the boundaries of its 16-acre property. Unlike many other developments in the city, the JBG property has adequate space onsite to handle internal traffic.

In essence, JBG has created the “problem” of internal circulation, and it is unnecessary for the D.C. Government to seek ways to correct an issue that would not have arisen but for JBG’s actions.

B. Woodley Road Bears Increased Traffic Due to Nearby Schools

The curb cuts will exacerbate increased traffic flow due to the schedule of nearby elementary schools. For instance, the curb cuts will interfere with the operation of the Aidan Montessori School, which utilizes 27th Street at Woodley Road as a drop off and pick up area for children. Because Aidan Montessori School serves children aged 18 months to 12 years, the school’s staggered pick ups and drop offs occur throughout the day, between approximately 8 a.m. and 8:45 a.m., 11:45 a.m. and 12:30 p.m., and 2:45 p.m. and 3:30 p.m. Pick ups and drop offs also occur for after school programs and generally take place between 4 p.m. and 6 p.m.

Additionally, parents of children who attend Oyster Bilingual School on 29th Street utilize Woodley Road to access that school’s drop-off area or to exit the neighborhood after dropping off their children at the Oyster Bilingual School. Recently, after much petitioning by the Oyster Bilingual School for assistance with traffic concerns, the District Government installed a new “no left turn” sign at the northern curb cut of the Oyster turnaround. This has been a great help to the school, but it does re-route significant drop off and pick up traffic back onto Woodley Road via the Woodley Road and 29th Street intersection since parents can no longer turn left out of the school’s drop off area in order to travel to Calvert Street. Students and parents driving to the Maret School also use Woodley Road, as vehicles driving north on Connecticut Avenue are prohibited from turning left onto Cathedral Avenue.

Furthermore, based on an agreement that Aidan Montessori School reached with the neighborhood to prevent traffic backups on 27th Street, if the designated pick up and drop off area is being fully utilized, parents must circle the block and not form a queue along 27th Street. This requires the parents to exit 27th Street, turn right onto Woodley Road, turn right onto 29th Street, and turn right onto Cathedral Avenue, in order to again proceed down 27th Street. Given the traffic that is generated as a result of these pick up and drop off times and this current agreement, any additional traffic will further clog Woodley Road and create added congestion at its intersection with Connecticut Avenue.

C. Traffic Will Increase Due to Location of New Parking Garage and Increased Density

It also is our understanding that the Marriott Wardman Park Hotel will continue to utilize Woodley Road as its primary entrance and that the proposed condominium development will also use Woodley Road as its sole entrance. The D.C. Department of Transportation should examine both the number of existing dwelling units and the number of proposed dwelling units within one square mile of the proposed development and the number of pedestrian generating facilities in or near the project (such as the Metro, the Wardman Park Marriott, etc.) to determine the impact on traffic. We understand that this is part of the criteria the D.C. Department of Transportation uses when it determines whether a location is eligible for traffic calming

measures. We also believe that such criteria should be considered when making a ruling on the Marriott Wardman Park curb cut applications.

Moreover, we believe there will be an increase in cars exiting Woodley Road at Connecticut Avenue, causing additional delays on Connecticut Avenue. We understand that the Woodley Road/Connecticut Avenue and the Connecticut Avenue/Calvert Street intersections have been given an “F” by the D.C. Department of Transportation for their “Level of Service.” JBG’s own traffic survey also assigns this intersection a grade of “F” for “Level of Service.” We believe that Woodley Road cannot absorb the increased traffic resulting from over 160 condominium units and that the nearby intersections will also become extremely congested due to the increased vehicle traffic from the neighborhood as well as normal business commuters.

D. Reduction in Number of Hotel Rooms Will Not Decrease Traffic

While we have strong doubts about the likelihood of JBG reducing the number of rooms at the Marriott Wardman Park (an issue that is addressed in more detail below), we believe that such a proposed reduction in the number of hotel rooms will not have a major impact on traffic even if the reduction occurs. Based on our experience, while a portion of hotel guests arrive by Metro or bus (which pick up and drop off at the 24th Street entrance of the Marriott Wardman Park), many also arrive by taxi or limousine at the hotel’s Woodley Road entrance. Thus, assuming that the number of hotel rooms will in fact be reduced, such a reduction will not significantly alter the traffic arriving at the hotel. In fact, the traffic at Woodley Road and Connecticut Avenue will worsen, given the increased number of residents living in the proposed condominiums at the Marriott Wardman Park site and the steady stream of taxis and buses that will bring additional guests to both the hotel and the condominium. Further, with the expectation of more regional, versus national, meetings, the expectation is that more people will drive their cars to these events, since meeting participants will live in or near Washington, D.C.

In addition, in attempting to show that the total number of trips of the hotel use will decrease, JBG’s traffic impact analysis does not use the industry-standard Institute of Transportation Engineers’ Trip Generation Rates (Land Use 310). Instead, JBG’s traffic impact analysis appears to create its own calculation. We urge the D.C. Department of Transportation to scrutinize this data and re-calculate the data using the Institute of Transportation Engineers’ Trip Generation Rates. Given the predominance of the use of the Institute of Transportation Engineers’ Trip Generation Rates, we question not only the validity of JBG’s conclusion but also the motive behind ignoring a standard utilized by the industry.

E. Revamping of Hotel’s Public Assembly Space Will Increase Traffic

JBG also has publicly announced that it is revamping the existing public assembly space at the Marriott Wardman Park with the intent of having a greater number of conferences at the hotel (specifically, more regional meetings with more continuous and overlapping event activity, as compared to fewer national meetings with longer setup and breakdown periods). In doing so, it has announced it is maximizing the public assembly space at the hotel, allowing them to “reposition” the hotel as a “regional meeting” center with “seamless” (*i.e.*, back-to-back)

scheduled conferences and meetings. JBG's current plans call for the construction of a new Junior Ballroom, and remodeling the approximately 200,000 square feet of meeting and banquet space to create a "unique-in-the-marketplace ratio of rooms to meeting space." According to JBG's own materials, this revamping of public assembly space will give the hotel "the flexibility to serve either one medium-sized group or two smaller groups simultaneously."

Currently, the Marriott Wardman Park experiences periods of high activity and periods of low activity. JBG has stated that they anticipate having a higher number of regional, mid-sized conferences at the location, which will boost the number of individuals traveling to the hotel by car. This, of course, will increase number of individuals both occupying and visiting the hotel (since not all convention attendees are hotel guests) and, concomitantly, will increase traffic. Regional attendees are less likely to arrive at area airports and utilize taxis, shuttle, or Metro transportation to Woodley Park. Instead, regional attendees are more likely to drive into Washington from Virginia, Maryland, Delaware, and southern Pennsylvania, further increasing traffic volume and exacerbating parking problems in Woodley Park. Additionally, a greater number of conferences will also increase traffic in the form of large commercial vehicles such as eighteen-wheelers, which are utilized for the loading and unloading of conference equipment.

The increase in hotel's occupancy rate will undoubtedly increase traffic on Woodley Road since most guests enter and exit on Woodley Road. The Louis Berger Group, a consultant hired by WPCA to evaluate the JBG study, estimates that the morning peak hour vehicle trips will be approximately 409 and the afternoon peak hour vehicle trips will be approximately 441. Certainly, these trips will exit primarily onto Woodley Road. We ask that the D.C. Department of Transportation closely examine any alleged reduction in hotel traffic, since the hotel traffic will become more constant (and likely increase) under the current plan announced by JBG to maximize public assembly space for small and mid-sized conventions and other gatherings.

F. Construction Will Increase Traffic Due to Massive Excavation

Finally, the project at the Marriott Wardman Park calls for massive excavation to allow for the construction of a three level underground garage and an approximately 90 foot-tall condominium building. Such excavations will necessitate a considerable number of heavy, large construction vehicles, which will travel down Woodley Road either to Connecticut Avenue or to 29th Street. If these large construction vehicles attempt to exit onto Connecticut Avenue, the two current eastbound lanes at the intersection of Connecticut Avenue and Woodley Road will be effectively eliminated, as the existing lanes are too narrow to allow for a large construction vehicle and an automobile to both utilize the two lanes. This, of course, will cause backups and delays at this intersection. We anticipate that these construction vehicles will also form queues down Woodley Road as they enter and exit the construction site. We ask that the D.C. Department of Transportation determine the number of trips per day that these trucks will make and include this information in its assessment of the traffic conditions along Woodley Road. We have been informed that this project will be conducted in phases, which will extend the period in which construction traffic will flow out of the Marriott Wardman Park site.

In addition, portions of Woodley Road currently has a posted weight restriction for vehicles in excess of 1 1/4 tons. Vehicles over this weight are prohibited from traveling west past the Marriott Wardman Park Hotel's entrance driveways, along Woodley Road in the direction of 27th, 28th, and 29th Streets. Woodley Road also restricts buses from traveling past the Marriott Wardman Park Hotel's entrance. Unfortunately, these restrictions are often ignored. It is axiomatic that these restrictions were placed upon Woodley Road for traffic and safety reasons. We are concerned that these restrictions would be violated by construction vehicles accessing the Marriott Wardman Park site, and we ask that you inform us whether such traffic would be prohibited given current restrictions. We further ask that the D.C. Department of Transportation consider the rationale behind the imposition of these restrictions when making a determination on the curb cut applications.

G. Examination of Traffic Growth is Required

Furthermore, we ask that the D.C. Department of Transportation examine the per year growth rate of traffic at Woodley Road and Connecticut Avenue and use this information in determining this project's effect on traffic in the neighborhood. We understand that the Marriott Wardman Park's traffic impact analysis assumed an annual growth rate of 0.5 percent, although it did not discuss the basis for this conclusion. However, the D.C. Department of Transportation's own study assumed a growth rate of 1% at the nearby intersection of Connecticut Avenue and Van Ness Street. Given the relative proximity to Van Ness Street, we believe a growth rate of 1% (or more) is more closely aligned with realities. Additionally, we ask that the D.C. Department of Transportation make an independent determination as to the number of trips that will be generated by the proposed development of the Marriott Wardman Park site.

V. Curb Cuts Will Worsen Parking Situation

As you know, traffic congestion and parking shortages are interrelated issues. The issues discussed below, combined with the loss of at least fifteen percent of all legal parking spaces along Woodley Road due to the proposed curb cuts, will cause the parking situation in Woodley Park to seriously deteriorate and will also cause the number of illegally parked cars in the neighborhood to increase. As you know, increases in the number of cars parked illegally can pose serious safety issues by decreasing or eliminating sight lines. While residents of the Woodley Park Community are not the only individuals creating a demand for parking, they bear the brunt of the impacts of parking on the neighborhood's quality of life and safety.

Based on our analysis, Woodley Park would be classified as Type 3, under the D.C. Department of Transportation's parking designation system. This means that it contains mixed residential and commercial areas, where demand exceeds supply. Parking is utilized by a wide range of people living in or visiting the Woodley Park Community, including Woodley Park residents, employees at the Marriott Wardman Park Hotel, parishioners at St. Thomas Apostle, individuals attending funerals or weddings at St. Thomas Apostle, schoolchildren and their parents at Aidan Montessori School and Oyster Bilingual School, tourists visiting the National Zoo, individuals visiting the commercial establishments on Connecticut Avenue, guests at the Marriott Wardman Park, and personal or professional visitors to homes and apartment complexes in Woodley Park.

Each of these groups present various demands for parking. While almost all demand for parking has the same general geographic component (individuals want to park near their ultimate destination), the temporal components of demand vary widely. Such temporal components include both the time of day and the day of the week parking is desired and the length of time required for such parking. The conclusions reached by JBG regarding the proposed project's impact on parking does not appear to be based upon these components, and we ask that the D.C. Department of Transportation closely examine these components when ruling on the pending curb cut applications.

Moreover, the calculations for parking spaces lost will have to consider the specifics of how close the proposed hotel driveways will be to each other. The two proposed driveways closest to Connecticut Avenue will be so close to each other that it is likely that parking will not be allowed between them, further decreasing the availability of parking in the neighborhood. Combined with the increased density of the neighborhood and the increased need for parking, we anticipate that the parking problem will be exacerbated by the proposed curb cuts.

A. Construction Vehicles Could Further Decrease Parking

We have been informed that Woodley Road would be the sole construction entrance for any work conducted upon the Marriott Wardman Park site. Given the narrow width of Woodley Road, we do not believe that it can support two-way construction traffic. The south side of Woodley Road is utilized for parking, decreasing the width for vehicular traffic traveling east on Woodley Road. We believe parking may be eliminated to allow for two-way construction traffic, because the excavation of the proposed underground parking garage and condominium will require large dump trucks (as well as other large construction vehicles) to constantly enter and exit the construction site. If parking is not eliminated, traffic congestion will occur along Woodley Road, as construction vehicles traveling east-bound must wait for construction vehicles traveling west-bound and vice versa. Accordingly, there will be a deleterious effect on either traffic safety or parking regardless of whether all of the existing parking on Woodley Road is maintained or eliminated.

In fact, construction traffic permits are pending for the elimination of approximately 375 feet currently used as parking spaces along Woodley Road during the three to four years of construction. This will constitute the elimination of 50% of the legal parking spaces currently available and an obstruction of half of the sidewalk for all pedestrians.

B. New Residents of Proposed Condominium Will Increase On-Street Parking

Given the anticipated sales price of these "state of the art luxury condominium" units, it is likely that the owners of such units will have at least two cars per household. However, the JBG Companies is only proposing 1.5 parking spaces per unit (based on JBG's public statement that the new condominium will have 160 units and 240 parking spaces). This excess of vehicles will force residents to utilize parking along 27th, 28th, 29th Streets, Calvert Street, or Woodley Road. Given the lack of parking spaces afforded to the Marriott Wardman Park project, a sizeable portion of the residents of the proposed condominium units and their guests often will seek on-

street parking along Woodley Road, or 27th, 28th, or 29th Streets. Significantly increasing the parking demand in an area that already has excess demand and limited supply further exacerbates the parking problems facing the Woodley Park Community.

C. Near-By Attractions Increase Demand for Parking

As has been previously noted, parents of children who attend Aidan Montessori School increase the demand for parking in the Woodley Park Community. These individuals require parking not only for picking up and dropping off school children but also for school meetings, teacher conferences, and special events held at the school. Parents parking to take their children to or from the Aidan Montessori School will be affected as less parking space will be available due to the three proposed curb cuts, one of which will be directly in front of 27th Street. Similarly, St. Thomas Apostle has parking needs on weekends and in the evenings for church services. It also has special events (including funerals, weddings, church meetings, and other events) that require additional parking. Moreover, St. Thomas Apostle must accommodate elderly parishioners. Like Aidan Montessori School, one of the curb cuts will be across the street from its property.

Furthermore, many tourists seek parking in the neighborhood. As the National Zoo continues to update and expand its exhibits (such as the Asia Trail, which is currently under construction), it anticipates an increase in the number of individuals visiting the zoo. Moreover, the arrival of Tai Shan, the baby Panda, has also dramatically increased visitors to the National Zoo. As stated previously, visitors to the National Zoo often utilize parking spaces in Woodley Park to visit the zoo. Any increase in visitors to the zoo will certainly have a concomitant increase in the use of parking in the Woodley Park neighborhood. Additionally individuals parking along Woodley Road to shop on Connecticut Avenue or to eat in one of the many restaurants located in Woodley Park, also increase the current demand for parking. Greater difficulty in finding parking spaces would likely increase illegal parking in areas close to the hotel.

VI. Curb Cuts Raise Environmental Issues

With regard to the environmental impact, it is clear that the new driveways will eliminate green space and cause the removal of many mature trees. This will result in an increase of impervious surface over the now green, open space, causing additional storm water flow into the neighborhood. As pointed out by the ANC representative, referring to the new sectional diagrams produced by the developer, the construction of this new service road will also have the consequence of effectively erecting a retaining wall along the site. This will occur adjacent to all apartment buildings running along 29th Street, whose lower floors will now have the appearance of being “sunken” and below grade. We ask that the D.C. Department of Transportation examine these and other environmental issues when considering the pending curb cut applications.

VII. Unease About Continual Changes to Construction Plans by Developer

We also raise significant concerns regarding the apparent fluidity of JBG’s plans for the site. JBG has not clearly laid out a timeline for the project. In fact, JBG has informed the ANC that

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the conversion of the Park Tower portion of the Marriott Wardman Park Hotel (the Park Tower contains the hotel rooms along Calvert Street) may not occur immediately but in approximately 2010. However, JBG has never announced these plans to the residents of the Woodley Park Community in a public meeting. Furthermore, JBG has announced amorphous plans to convert the historic Wardman Tower to condominiums, but it has not indicated a timeline for such a conversion. Any change to the Wardman Tower will certainly have an impact on many aspects of the project, including parking and traffic, since residential units could increase the net occupancy rate of the Wardman Tower.

Given that the D.C. Department of Transportation cannot revoke a curb cut application once it has been approved, we request that the D.C. Department of Transportation ensure the reliability and definiteness of any plan submitted regarding this project and request full information regarding the phasing of construction to ensure that the development plan will go forward as submitted. If a developer is allowed to significantly alter its construction plan after the D.C. Government has approved a curb cut application, the approval process becomes nothing more than a charade, whereby the D.C. Government accepts as fact whatever scenario the developer wishes to put forth and has no remedy available to address misrepresentation (or even fraud) by the developer.

VIII. Consideration to ANC Input

Finally, we ask that the D.C. Department of Transportation give the required “great weight” to any recommendation put forth by the ANC on this issue, and we seek your personal assurance that the ANC’s views will be given the deference required by law. The ANC has held several public meetings on this proposed development and these meetings have been very well attended by WPCA members, other interested Woodley Park residents, as well as Council Members and their staffs. In fact, the meetings ANC has held to date have been attended by over 100 individuals. We applaud the efforts of the ANC to keep the community informed about the Marriott Wardman Park project and urge that the D.C. Department of Transportation gives the proper weight to the ANC’s recommendation.

IX. Conclusion

Thank you in advance for your consideration of the issues we have raised above. If you have any questions or concerns regarding any of the points discussed above, please do not hesitate to contact me at (202) 462 6082. We look forward to receiving your prompt reply and to scheduling a meeting with you to discuss these and other concerns we have regarding this project.

Sincerely,

Elizabeth Franklin
Concerned Woodley Park Resident

Laura Ingraham
Concerned Woodley Park Resident

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Ruth Anne Keister
Concerned Woodley Park Resident

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Mary Lou Schramm
Concerned Woodley Park Resident

Nan Simpson
Concerned Woodley Park Resident

Janet Frank
Concerned Woodley Park Resident

Hans Israelsson
Concerned Woodley Park Resident

cc:

The Honorable Anthony Williams
The Honorable Linda Cropp
The Honorable Jack Evans
The Honorable Carol Schwartz
The Honorable David Catania
The Honorable Phil Mendelson
The Honorable Kwame R. Brown
The Honorable Jim Graham
The Honorable Kathleen Patterson
The Honorable Adrian Fenty
The Honorable Vincent Orange

The Honorable Sharon Ambrose
The Honorable Vincent C. Gray
The Honorable Marion Barry
ANC Commissioner Dia Black
ANC Commissioner Trudy Reeves
ANC Commissioner Deborah Jane Lindeman
ANC Commissioner Sheila Hogan
ANC Commissioner Stephanie Zobay
ANC Commissioner Catherine May, MD
ANC Commissioner Avram Fechter
ANC Commissioner Nancy MacWood
ANC Commissioner Bruce Beckner

ATTACHMENT 3

**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.*

ATTACHMENT 4



Woodley Park

Community Association

P.O Box 4852 Washington, D.C. 20008

SECRETARY'S CERTIFICATE

As Secretary of the Woodley Park Community Association I certify that the following resolution was adopted by a vote of the Members of the Association at a Special Meeting of the Members held on April 5, 2006:

"The Woodley Park Community Association (" WPCA") opposes any and all new curb cuts / driveways as well as any and all applications for curb cuts / driveways and street tree removals at the Wardman Development Site, with a principal address at 2660 Woodley Road, NW".

By: Stephanie Zobay
Stephanie Zobay
Secretary
Woodley Park Community Association