



GOVERNMENT OF THE DISTRICT OF COLUMBIA
Executive Office of the Mayor
Office of the Deputy Mayor for Planning and Economic Development



October 15, 2015

VIA ELECTRONIC MAIL & HAND DELIVERY

Mary M. Cheh
Councilmember
Council of the District of Columbia
1350 Pennsylvania Avenue NW
Washington, DC 20004

Re: Capitol Crossing

Dear Councilmember Cheh,

Thank you for your letter dated September 24, 2015 regarding the Capitol Crossing project. The I-395 Air Rights Project has the potential to be a transformative transportation infrastructure and economic development project for the District. My office and the District Department of Transportation (DDOT) are working to ensure that work is completed safely and responsibly with a goal of ensuring minimal inconvenience and maximum benefit to residents and visitors during construction and upon completion of the development. I would like to briefly review the history of this project, provide an explanation of the merits of Alternative 3, and discuss the permitting process. Capitol Crossing is moving forward and is under construction according to Alternative 3.

The pre-development work on Capitol Crossing has been on-going for five years, all in direct coordination with and under the oversight of a variety of District of Columbia agencies and entities and the Federal government. In 2009, the developer through DDOT secured conditional approval of the disposition of the property from the Federal Highway Administration (FHWA), pending completion of an environmental review process. In addition, the developer applied for a Planned Unit Development (PUD) re-zoning of the property that was approved by the DC Zoning Commission in July 2011. The *Environmental Assessment (EA) for I-395 Air Rights Project* was completed in October 2011. The *Finding of No Significant Impact (FONSI) for the I-395 Air Rights Project* (March 2012) explains that DDOT identified modified Build Alternative 3 as the Preferred Alternative. FHWA concluded that the Preferred Alternative/modified Build Alternative 3 would not have a significant impact on the natural or human environment, and that preferred alternative is currently being constructed by the developer.

It is important to note that many of the regulatory processes detailed above mandate the active participation of the affected communities. DMPED is keenly aware that throughout the pre-development period, particularly during the zoning process and the EA process, the developer regularly met with and presented full plans to the affected Advisory Neighborhood Commissions (all of which supported the project during zoning proceedings and contributed comments during the EA process). The developer also engaged all of the project's "neighbors", including Georgetown University, the Downtown DC BID, the Federal City Shelter, Holy Rosary Church, the Jewish Historical Society, and the adjacent residential buildings. In other words, the planning of this project has been fully transparent, and there has been ample opportunity for any affected party to shape the final product.

As your letter correctly articulated, Alternative 3, unlike the other two options, would permanently close the 3rd Street on-ramp, replacing it with an on-ramp on Massachusetts Avenue (often referred to as the "Massachusetts Avenue Portal"). While your letter is correct in identifying some of the turning movements and

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traffic patterns that will result, the analysis in the environmental documentation reveals that, from a traffic standpoint, Alternative 3 is not fundamentally different from the other options but in many ways is functionally better than the alternatives. All three alternatives were projected in the EA/FONSI to have relatively similar morning and evening peak period levels of service (LOS) for intersections in the potentially impacted area. The wording of the EA itself provides the best response:

[Build Alternative 3] is the only alternative that makes improvements in the transportation network with regards to traffic operations and safety: Build Alternative 3 improves the transportation network by redistributing traffic volumes throughout the network. Build Alternative 1 and 2 merely replicate existing conditions, leading to no noticeable improvement in operations and safety. Build Alternative 3 allows for better geometrics in terms of the approach to the on-ramp and the functional operation of the lanes within the tunnel portion. Build Alternative 1 and 2 require the driver to make earlier decisions, navigate more complex geometry in the form of an S-curve, and negotiate a lane merge within a curved tunnel section...

[Build Alternative 3] is the best alternative when considering pedestrian and bicyclical activities...

[Build Alternative 3] is the only alternative that makes network-wide improvements as documented by Measures of Effectiveness...

In every case, Build Alternative 3 showed better results when compared to the No Build and Build Alternatives 1 and 2.

Furthermore, Alternative 3 is the preferred option on the basis of pedestrian accommodation. Replacing the 3rd Street on-ramp with the Massachusetts Avenue Portal will reduce the capacity on Massachusetts Avenue and reduce the volume of traffic accelerating from eastbound Massachusetts Avenue to enter the highway at 3rd Street, resulting in a more pedestrian-friendly crossing along H Street/Massachusetts Avenue across 3rd Street. As the FONSI notes,

Impacts on parking would be neutral. Impacts on bicycle and pedestrian circulation would be positive as the removal of the existing 3rd Street entrance ramp and the elimination of the 3rd Street exit ramp would allow for the re-establishment of continuous sidewalks along 3rd Street and eliminate two sources of conflict between vehicles and pedestrians, improving safety. Reestablishing F and G Streets across the freeway, complete with sidewalks, would substantially improve pedestrian connectivity as well.

While all options propose reconnecting F Street and G Street to knit together the neighborhoods currently bisected by the highway, this new pedestrian realm and neighborhood connectivity will be enhanced by the pedestrian benefits of Alternative 3 and the closure of the 3rd Street On-Ramp.

Your letter correctly notes that Alternative 3 provides the greatest flexibility to the developer in square footage below grade. By maximizing the developer's design flexibility, Alternative 3 will also support the District's economic development goals, ensuring that a more efficient use of space and a stronger urban design can be developed within the constraints of the site.

WMATA was consulted during the EA process and did not raise objections to the Preferred Alternative. The X2 Metrobus route currently runs east-west along H Street in this portion of the city. The FONSI explains: "under the Preferred Alternative, there would be an adverse effect on Metrobus routes running along H Street (X2, X9, and 80) because of the realignment of the intersection of H Street with Massachusetts Avenue." While this would



result in greater travel times relative to a no build condition, the EA noted that "the impacts of Build Alternative 3 on transit would be the same as those of Build Alternative 1 or 2 with the Design Option. There would be no significant adverse impacts."

DDOT and FHWA have handled their respective reviews and oversight of this project, particularly during the important Environmental Assessment process, with due diligence and with the requisite expertise demanded of those agencies by our citizens. I feel confident that the transportation alternative selected for Capitol Crossing is the best alternative for the safe and effective operation of vehicular and pedestrian transportation in this area and for the public.

Finally, I want to assure you of the extensive and ongoing coordination meetings between District senior officials and staff, the FHWA District Office, the development team, and peer-review engineering consultants to ensure the safety and success of this project. Capitol Crossing is proceeding according to the normal permitting process for a private sector development. Since the utility portion will be returned to DDOT control for operations and maintenance after the completion of the development, that portion has been treated as a DDOT project through some of the permitting stages. DDOT and the developer meet on a weekly basis – at a minimum – to review plans and construction drawings that are then submitted for approval in the usual and customary permitting processes utilized by DDOT (i.e., the Transportation Online Permitting System, or "TOPS," operated by the Public Space Regulations Administration), the Department of Consumer and Regulatory Affairs, and any other applicable District agency. No work on the Capitol Crossing project has proceeded without DDOT approval and collection of appropriate funds, including special tree removal for which the District collected the proper fees.

Thank you for the opportunity to clarify some of the details of this complex project. The developer is actively moving forward on infrastructure work according to Alternative 3, and the District is a committed partner in this work. The Preferred Alternative will enhance pedestrian and bicycle connectivity, without significantly adversely affecting the circulation of automobiles or Metrobus. While there is no longer an opportunity to revisit the decision which led to the selection of this alternative, the construction and development of a project at this scale is an iterative process that involves review, oversight, and flexibility. I welcome your continued interest as Capitol Crossing progresses over the months and years ahead.

Sincerely,



Brian T. Kenner
Deputy Mayor

BTK/ipw
Enclosure

Cc: Jack Evans, Councilmember, Ward 2
Charles Allen, Councilmember, Ward 6
Maia Estes, Director, Office of Policy and Legislative Affairs, Executive Office of the Mayor
Leif Dormsjo, Director, District Department of Transportation

