The Committee of 100 on the Federal City



November 19, 2011

Founded 1923

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1317 G Street, N.W. Washington, D.C. 20005 202.681.0225 info@committeeof100.net Dear Mr. Flournoy:

This email message is to provide comments of The Committee of 100 on the Federal City on the "Environmental Assessment for I-395 Air-Rights Project" issued in October 2011 with a comments due date of November 21, 2011. This Environmental Assessment deals with different arrangements for egress and access ramps to and from this section I-395 through the eastern section of Downtown Washington, D.C. Decisions on ramp arrangements are a necessary prelude for moving forward with the proposed air-rights development between 2and and 3rd Streets from E Street north to Massachusetts Avenue, NW.

These comments are being submitted in an email format due to travel complications. I would appreciate an email confirmation that the comments have been received.

The Committee of 100 on the Federal City is pleased to see this project move forward. This project, along with associated development project, has the potential to repair the Center Leg Freeway gash/barrier through the eastern area of Downtown that has existed for some 40 years. These two projects also allow the restoration of sections of F and G Streets between 2nd and 3rd Streets, NW. These two street sections are part of the original L'Enfant Plan.

The Committee of 100 provided comments to the D.C. Zoning Commission on December 6, 2010 on the first stage PUD for the associated Center Leg Freeway development project, called "Return to L'Enfant" (Case No. 08-34). We also note that this I-395 Air Rights Project, and the related development project, have implications for Downtown and related areas beyond the boundaries of the this project. The EA notes, on page 4 of the "Purpose and Need" Section, that the DC Office of Planning addressed some of these implications in its 2008 report, *Center City Action Agenda*. Additional actions in adjacent areas, beyond the scope of the EA, will be necessary in the future.

The I-395 EA outlines three alternatives for redesign of access and egress ramps, and a "Design Option" that applies to Alternatives 1 and 2. After review of the alternatives, the Committee of 100 believes that a mix of Alternatives 1 and 2 is desirable. The design of the 3rd Street access ramp south of Massachusetts Avenue in Alternative 1 minimizes the impact on the 3rd Street ROW in terms of the east sidewalk alignments related to future development. However, the design of the 2nd Street egress ramp in Alternative 1 would substantially negate the benefits of reopening G Street across the freeway between 2nd and 3rd Streets. Therefore, the design of the 2nd Street egress ramp in Alternative 2 seems more desirable. We do not believe that Alternative 3 is an attractive alternative. Massachusetts Avenue was a major avenue in the L'Enfant Plan and it remains very important today. Alternative 3 would introduce a new tunnel portal in the center of Massachusetts Avenue that would have some negative visual impacts. In addition, traffic access from different directions is limited by the location of the ramp in Alternative 3. We therefore believe that Alternative 3 should be dropped from consideration.

The "Design Option" for restoration of Reservation 76 (north side of Massachusetts Avenue between 2nd and 3rd Streets) seems desirable in urban design and historical terms. However, in view of the importance of traffic flows involving H Street and Massachusetts Avenue, and adjacent streets, such a change needs very careful and cautious consideration. Today, H Street NW/NE is a major east-west arterial from west of the White House area through the north side of Downtown, connecting with new development in NOMA and with the revitalized area along H Street, NE. In the Downtown area, H Street is important in terms of the new City Center complex, now under development, new development around Mount Vernon Square, and Chinatown. Limiting or complicating the traffic flow across Massachusetts Avenue may well be counterproductive.

The Committee of 100 looks forward to an early decision on the design of access and egress ramps so that the overall development project can move forward through the next stages of review and on to the first phases of air-rights construction.

Sincerely,

John Fondersmith

John Fondersmith, AICP Representing the Committee of 100 on the Federal City

cc: Michael Hicks
US Department of Transportation
Federal Highway Administration

Richard Houghton, Chair Planning Subcommittee Committee of 100 on the Federal City

George R. Clark, Chair Committee of 100 on the Federal City