

**Testimony of Chuck Ludlam
On Behalf of the Springland Farm Community LLC
Case 17703A: Application of Sidwell Friends School
March 1, 2016.**

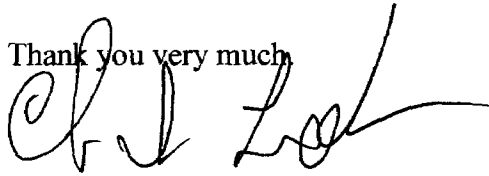
Attached to this email is prepared testimony in Case Number 17703 A – Application of Sidwell Friends School.

I am the Secretary of the Board of the Springland Farm Community LLC. We have filed today to appear as a party in this case.

I am authorized by the LLC Board to submit this testimony. This authorization includes the power of the Springland Farm Community LLC to be bound in this case before the Board.

Separately I have submitted proposed findings of fact and conclusions of law that are consistent with this testimony.

Thank you very much.



Chuck Ludlam
Secretary, Springland Farm Community LLC

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On Behalf of the Springland Farm Community LLC
Case 17703A: Application of Sidwell Friends School
March 1, 2016**

Madam Chair Person and Members of the Board of Zoning Adjustment

I am Chuck Ludlam, the founder and organizer of the Springland Farm Community LLC. I currently serve as Secretary of our LLC. I am here to testify on behalf of the LLC in Case 17703A: Application of Sidwell Friends School to reconfigure the Washington Home to become the Lower School campus for Sidwell. The Springland Farm Community LLC is authorized by its members living within 200' of the property in this case to represent them and they have submitted signed authorizations confirming that they agree to be bound by the submissions of the Springland Farm Community LLC in this case.

Springland Farm Community LLC

The Springland Farm Community LLC has filed a request to be designated as a party in this case. (Application of February 16, 2016).

The Springland Farm Community LLC represents 100 homeowners on the historic Springland Farm, founded in 1800 by John Adlum. His heirs became real estate developers and built essentially all of the homes in our community. The boundaries of the Adlum farm include Springland Lane, Tilden Street, Upton Street and adjoining streets. The Adlum manor house is historically designated as is the farm's spring house. Our homes surround the Sidwell proposed Lower School campus; we represent the most proximate neighbors to the project. Many of our members live across the street from the project, well within 200 feet of its perimeter.

Our LLC led the intensive and successful negotiations between the neighbors and Sidwell Friends School. We expect to reach a global agreement to recommend to the ANC and BZA regarding this development and our witnesses at the March 1 hearing will testify in favor of the project, with detailed stipulations.

That said, we will oppose a proposal that may be made by the Van Ness Coalition¹ to amend the Sidwell petition to demand the removal of DDOT approved and constructed traffic calming islands on Upton Street. Sidwell has said that removal of one or both of these islands is not necessary for implementation of the plan to mitigate traffic embodied in our global agreement between the neighbors and Sidwell, so this possible amendment by the Van Ness Coalition is not germane to the Sidwell petition and should not be considered by the BZA in this case.

¹ We do not know if the Van Ness Coalition has applied to appear as a party in this case. Nor do we know if such a request would be granted by the BZA. To our knowledge, none of the VNC members live within 200' of the Sidwell project.

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DDOT Traffic Calming Measures on Upton Street

We anticipate that some residents in other neighborhoods – such as the members of the Van Ness Coalition – will argue that the Sidwell petition and the ANC resolution should be amended to call for the removal of one or both traffic calming islands installed on Upton by DDOT (2003-2008 process). The Springland Farm Community LLC opposes such an amendment.

It is clear that this amendment is not germane to the Sidwell BZA petition and that to remove either of these traffic islands would be fundamentally inconsistent with the global agreement that the proximate neighbors (i.e. those living within 200' of the project) have reached with Sidwell to mitigate the traffic impacts of their moving their Lower School to the Washington Home property.

In terms of being non germane, Sidwell's December CTR says, removal of the [Wisconsin Traffic island on Upton] is "not necessary to mitigate the impact of Sidwell's proposed project..."

Jami Milanovich of Wells says, "Removal of the island is not required to make the Wisconsin Avenue/MS plan work." (Email of February 7, 2016).

Phil Feola of Goulston says, "It is, and will be, Sidwell's position that it is neutral regarding the Upton Street traffic island both during and after construction of the Lower School on the Washington Home site." (Email of February 8, 2016)

In its January 26 response to the DDOT comments, Sidwell says that it is "not advocating for or against removal of the traffic calming devices and [has] explored other options for accommodating the school's traffic and mitigating its impact. Specifically, Sidwell will implement a TDM plan that will reduce traffic by 30 percent and will shift its Middle School drop-off/pick-up operations to the new circle on Wisconsin Avenue. The effectiveness of these measures is documented in detail in the CTR."

The bottom line is that Sidwell does not consider these traffic islands on Upton to be germane to its BZA petition. It considers them to be outside the scope of its petition. Not relevant. We believe that unless a party can establish that the islands *are* germane to this case, the BZA should not consider them in the course of adjudicating Sidwell's application. Moreover, as explained below, it would be untimely and inappropriate to consider dismantling a *traffic calming* measure in the context of evaluating Sidwell's plan to ameliorate the *traffic increases* from bringing the Sidwell Lower School to the Washington Home property. And it would be unwise as a matter of policy at any other time to do so.

History of the Traffic Calming Islands

In 2003 the Springland Farm Community petitioned DDOT to perform a traffic calming study for Upton Street. DDOT did so and it proposed to construct two traffic calming islands among other measures including two speed humps² and a “no left turn” sign on Reno.³ The proposals for the traffic calming islands did not come from our community; they came from DDOT. Our community supported these recommendations, the DDOT plan was approved by DDOT and the islands and speed humps were constructed by DDOT, a project completed in early 2008. These traffic calming measures have proven to be exceptionally effective in calming the traffic in our residential community. They are, in fact, a leading example of how the City’s traffic calming program may achieve its objectives.

One of the traffic calming islands is located at the entrance to Upton Street at Wisconsin Avenue. It permits vehicles exiting Upton onto Wisconsin to turn right – going north. It permits vehicles traveling north on Wisconsin Avenue to turn right – going east – on Upton Street. It does not permit vehicles coming south on Wisconsin to turn left – to enter Upton Street going East. It does not permit vehicles exiting Upton onto Wisconsin to turn left – to go south. The effect of this diverter is to prevent morning rush hour traffic from cutting through on Upton – avoiding artery and connector streets such as Van Ness.

The other traffic calming island is located at the entrance to Upton at Reno Road. It does not regulate the volume of traffic that may enter or exit Upton. Its sole purpose is to slow traffic and it has been extremely effective to that end.

DDOT’s proposal for the traffic islands was, and remains, consistent with the purpose of the District’s traffic calming program: “improving the quality of life in our neighborhoods and addressing traffic-related safety issues throughout the city.” DDOT says on its web site:

- In terms of volume control measures, their “primary purpose...is to divert traffic and discourage cut-through traffic.”
- “They [traffic calming measures] are appropriate only on local streets with documented cut-through traffic issues.” This is true for Upton.
- “They should be only used at local road intersections with collector or arterial streets, since they can accommodate the diverted traffic.” This is true for Upton.
- “They may be used on streets with volumes up to 3,500 ADT [Average Daily Traffic].” This is true for Upton.

² One speed hump is located mid-block on Upton between 37th and 38th Street and the other is located mid-block on Upton between Reno and 37th Street. These speed humps are directed at speeding traffic and they have been extremely effective in slowing the traffic speeding down Upton – a street that drops 70’ between Wisconsin and Reno.

³ The “no left turn” sign on Reno applies to PM rush hour traffic and it prevents vehicles from turning left – going west – on Upton. This sign is directed at cut-through traffic. It has been extremely effective in preventing this cut-through traffic.

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- Half Closures/Semi-diverters are “good for locations with extreme traffic volume problems...” For Upton, the islands reduce cut-through traffic and slow traffic speeds and also help the neighbors to deal with Hearst, Sidwell and the Washington Home traffic.
- The principal advantage of these volume control measures is that they are “very effective in reducing traffic volumes; average decrease of 40% in traffic volumes.” This has been true for Upton.
- The disadvantage is that they “may create circuitous routes for local residents.” In our case, our association of the 100 homes on and near Upton Street is perfectly content to take other routes as a very small price to pay for reducing the cut through traffic.
- These volume control measures “cannot be installed on major emergency response routes and transit routes.” This issue does not apply to Upton Street.
- These volume control measures “may limit access to the businesses on local streets.” This also does not apply to Upton Street because there are no businesses located there.
- These volume control measures may mean that “enforcement may be required to keep motorists from violating the directional closure.” We have seen no evidence that traffic is circumventing the traffic island at Wisconsin. So we see that the traffic calming island at Wisconsin is completely appropriate and well justified.

All of these standards and concepts align to support the traffic calming islands DDOT proposed, approved and constructed on Upton. DDOT adopted these traffic calming islands in a manner completely consistent with the District’s Traffic Calming program. The District says on its website, “Desired outcomes of the Traffic Calming Assessment process may include a reduction in traffic speed, enhanced residential comfort, and improved general safety for pedestrians and bicyclists.” Among the “types of traffic calming measures are “volume control measures [that] discourage the cut-through traffic in residential neighborhoods.” The District answers the question “What is Traffic Calming” by stating that it includes “physical measures are taken to make speeding more difficult and cutting-through less attractive.” This applies perfectly to the traffic conditions on Upton.

The reason DDOT installed the traffic islands on Upton is that our street – unlike any other street between Western and M Street – is the site for three large and adjacent institutions that generate huge amounts of traffic – Hearst Elementary School, Sidwell Friends School and the Washington Home. After studying the resulting traffic congestion, DDOT concluded that reducing the cut-through traffic was the appropriate way to prevent total gridlock in the community. Even with the island, of course, we still have a serious gridlock problem each morning and evening around Hearst and Sidwell. With the addition of the Sidwell Lower School, it is a virtual certainty that the gridlock problem will worsen if the traffic islands are removed. Every car coming down Wisconsin that wants to avoid Van Ness would have an incentive to turn onto Upton. This is utterly inconsistent with the District’s traffic calming program.

Proposal to Remove the Traffic Calming Islands

As we have said, we anticipate that residents in other neighborhoods will argue that the Sidwell petition should be amended to remove one or both traffic calming islands installed by DDOT.⁴

The Sidwell BZA petition and the global agreement with the proximate neighbors focus intensively on mitigating the traffic gridlock in the neighborhood and preventing it from becoming substantially worse.

The global agreement with the neighbors would move the Middle School drop-offs and pickups to Wisconsin Avenue and sharply limit the number of parents of Lower School students who would need to drive into our neighborhood at least two times each day. With no Middle School parents and few Lower School parents driving their kids for drop-offs and pickups on Upton and 37th Streets, we expect to see a dramatic reduction in the current gridlock we see around the Hearst and Sidwell schools.

In a BZA case with the potential to be extremely controversial, it is heartening to see that the proximate neighbors will endorse the Sidwell BZA petition. It would be unfortunate, and we believe outrageous, for any party or any group to advocate removal of the traffic islands in the context of fairly evaluating Sidwell's proposed solutions. Any such attack could jeopardize the BZA process, the agreement between Sidwell and the proximate neighbors, and certainly would make it more complicated. That's not what we need when we have made so much progress in resolving the issues regarding the proposed expansion. Indeed, removing the traffic island would turn the BZA process on its head by increasing traffic far beyond what is involved in Sidwell's requested variance, the opposite of what the BZA process should do.

It would also be unfortunate to see us agree on significant remediation of the current gridlock in traffic around Hearst and Sidwell only to see this undercut – in an aggressive zero sum game – with the removal of the traffic island at Wisconsin and the resulting introduction of substantial **additional** volumes of cut-through traffic on Upton. To be sure, nearly all of this cut-through traffic will have no connection to either Hearst or Sidwell. We neighbors have suffered from gridlock for many years from Hearst and Sidwell and now we see in Sidwell's proposal the prospect that it will be effectively remediated. This is a fantastic result that no one thought was possible when this BZA process began. With this achievement, now is the worst possible time to introduce a whole new source of gridlock – cut-through commuter traffic mostly from/to Maryland. It would be grossly unfair to inflict this zero sum game on the neighbors just when they can see that the Hearst and Sidwell traffic gridlock is about to be finally remediated.

Documenting the zero sum negative impact of removing the traffic island, we have examined the data that underlies Sidwell's Comprehensive Transportation Review (CTR). That data indicates that if the Upton traffic island is removed, in just one hour – AM peak from 8:00-9:00 – we'd see

⁴ The ANC for our neighborhood – 3F – is scheduled to meet February 23. We anticipate that it will adopt the global agreement reached by Sidwell and the proximate neighbors, an agreement that will not mention the traffic calming islands. The DDOT report on the Sidwell project may be submitted around the same time.

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a 171% increase in traffic on Upton. For PM school peak from 3:15-4:15 we'd see a 67% increase. For PM peak from 5:00-6:00 we'd see a 162% increase. And who would benefit? These negative impacts on Upton would yield a tiny decrease in traffic on Van Ness – only a 12% decrease in volume during the AM peak hour, a 12% decrease during the PM school peak hour, and a 7% decrease during the PM commuter peak hour. The dramatic negative impact on Upton surely is not cost effective or fair in proportionate to the trivial benefit to Van Ness. Indeed it'd mean that there would be only a 40% difference in the number of cars on Upton – a residential street – as on Van Ness – a major connector street.

Still worse, Upton Street is not the only loser – all traffic on Wisconsin will be adversely affected. According to the Sidwell CTR, the left turners from Wisconsin onto Upton would cause an average delay at the Upton / Wisconsin intersection of 15% for all of the 3,454 cars proceeding north and south at AM peak. In general, all approaches would experience some increase in delay. The approaches with the most significant increase vary by time of day. For example, during the morning peak hour, the westbound and southbound approaches would see the largest increase in delay while the eastbound approach would see the largest increase in delay during the evening peak hour. So the mix of impacts of removing the island – decidedly negative for our residential street, trivially positive for an artery street, and a 15% average delay for nearly 3,500 cars in that AM peak hour – well, it's hard to imagine any possible public policy rationale for removing this traffic island. Remember these are the harms that would be inflicted during these few hours. Adverse traffic effects would continue 24 hours a day and 365 days a year. And think about the extreme irony if this amendment were affixed to a BZA order focused on remediating traffic in the neighborhood around Sidwell's project. It's obvious that removing the island is wildly inconsistent with the issues raised by the Sidwell BZA petition and it's wildly inconsistent with the City's traffic calming priority.

There is no comparison between Hearst / Sidwell traffic – which arises for two hours during school days – and cut-through traffic – which operates 24 hours a day 365 days a year. This difference is another way of demonstrating that the traffic island issue is non-germane to the Sidwell BZA petition and profoundly inconsistent with it.

We anticipate that some residents in other neighborhoods might argue removing the Wisconsin island “only during construction” of the Lower School. That makes no sense. Sidwell has said it does not need to remove the traffic island at Wisconsin during the construction period. So this amendment is not germane. More importantly, we are quite certain that if the island is removed, it'll never be rebuilt.

Dangerous Precedent in DDOT Reversing Traffic Calming Plans

We do not see any basis in the DDOT traffic calming program metrics for DDOT to reverse its decision to approve and construct the traffic islands. Surely with regard to such a U-turn, proponents of removing the traffic islands bear a heavy burden in explaining why DDOT's reasons for proposing, approving and constructing the islands were invalid then or now. For DDOT to reverse itself would be profoundly unfair to the neighbors, including newcomers after the islands were installed, who have relied on the islands to calm traffic. Surely the property values on Upton will drop if it takes on the traffic we now see on artery streets like Van Ness.

We consider the DDOT traffic calming measures in our community to be a major traffic calming success and a credit to DDOT. We are very appreciative that DDOT has been so responsive to the needs of our community for traffic calming.

If DDOT were to reverse itself regarding the traffic islands, we believe a wave of alarm would ripple throughout the communities where traffic calming measures have been adopted. They'd all worry that DDOT can be fickle and might reverse itself. We'd certainly push for the Council to defend traffic calming throughout the City from any DDOT reversals. If it becomes apparent that BZA orders regarding traffic measures for a project are not binding on DDOT, the ripple effects for reaching such agreements and believing that they are fixed might be undermined.

Unsettled Conditions Regarding Traffic

While we see no basis for the BZA to address this issue in this case, and none for DDOT to reverse itself, if DDOT moves to do so, it should wait for at least a year after the Lower School is opened so that it and we, and ultimately the BZA, can assess the likely impact on traffic in the neighborhood. If the traffic island at Wisconsin is removed when the Lower School is opened, Sidwell and DDOT will have no possible way to sort out the cause and effect of what is sure to be a serious increase in gridlock on Upton. We'd have two major variables working – at cross purposes – at the same time. With that confusion, it would be substantially more difficult for Sidwell to assess the impact of its Lower School traffic remediation strategy – and jeopardize its ability to establish that it has satisfied the metric that determines whether it can expand its student body. In effect, Sidwell would be blamed (unfairly) for the cut-through traffic.

In addition, DDOT should wait until the plans for redeveloping the 3900 Wisconsin property (Fannie Mae) are finalized. This 9.71 acre property (422,876 square feet) is zoned C-2-B which allows for matter-of-right medium density, including office, residential, retail, or a mix of the three, with a maximum height of 65 feet (6 stories), a maximum lot occupancy of 80% for residential use and 100% for all other uses, and a maximum FAR (Floor Area Ratio) of 3.5 for residential use and 1.5 for other permitted uses. Obviously we could see a rather massive redevelopment of the Fannie Mae property that generates considerable additional traffic, including substantial additional cut-through traffic on Upton Street (headed west primarily in the morning and east to 34th/Reno, primarily in the evening). Repurposing the existing Fannie Mae property appears to be unlikely given that one reason why Fannie Mae is moving is the poor quality of that iconic structure. "Instead real estate developers are more likely to see this property as a lucrative site for the kind of mixed-use projects that are going up elsewhere on Wisconsin Avenue." <http://tenleytowndc.org/2014/08/28/fannie-mae-to-sell-wisconsin-ave-headquarters/>

DDOT also should wait until plans for redevelopment of the Hearst Park are finalized. Those plans might include a public outdoor swimming pool, renovation or replacement of the existing soccer fields and tennis courts, picnic areas, bocce court, Frisbee golf course, horse show pitch, and expanded recreation center. It is clear that the park may generate substantial traffic. DDOT might find it necessary to install a traffic island at Wisconsin and Quebec or other traffic calming measures.



Needless to say, it would be quite wasteful, destructive and embarrassing for DDOT to first build the traffic island, then tear it out, and then rebuild it when we see vast amounts of cut-through traffic headed to and from 3900 Wisconsin or the park.

If DDOT were to propose to remove the Wisconsin traffic island, it should NOT propose to insert a dedicated left turn signal on Wisconsin (for southbound traffic turning east on Upton) or a dedicated left turn signal on Upton (for westbound traffic turning south on Wisconsin). This will only encourage additional cut through traffic – the opposite of traffic calming. These turn signals would also introduce additional substantial delays for Wisconsin traffic not turning onto Upton.

Traffic Calming Island on Upton at Reno

Finally, regarding the traffic island on Upton at 34th / Reno, it is possible that those in other neighborhoods might propose to remove it. That traffic calming measure also DDOT proposed, approved and constructed. We oppose this amendment if it is proposed.

It is equally non germane. Sidwell did not consider this island to be within the scope of its submission. DDOT didn't ask Sidwell to prepare an analysis of this island. And none has been prepared because this island – a long block distant from the Sidwell project – is simply not at issue with regard to the Sidwell project.

With regard to this island, there can be no credible argument that removing it will facilitate the flow of traffic in the neighborhood, let alone around Hearst and the Sidwell campus. This island is focused on reducing speeding, not traffic volume. It is a classic and non-controversial traffic calming measure.

Prior to DDOT's insertion of the island at Upton and 34th/Reno – in what had been a dedicated right turn lane – traffic would speed around this corner in the dedicated lane rushing to beat the traffic coming down 34th/Reno towards Tilden. Cars would actually accelerate as they approached the stop sign. Cars would routinely run the stop sign in a game of chicken with the traffic coming south on Reno. This was dangerous to everyone – traffic on 34th/Reno, traffic on Upton and the residents of Upton. On multiple occasions, cars parked near this intersection were side-swiped. For those of us whose driveways exit on Upton immediately before 34th/Reno, it was frightening to try to enter Upton going in either direction. We faced a race course speeding by our driveway. DDOT's traffic island forces cars to stop before they turned onto 34th/Reno. This simple step has substantially slowed traffic on Upton – it's been more effective than the speed humps. Also, with the landscaping that the community provided – \$15,000 has been donated to the District from 30 neighbors – we have an elegant gateway into the Springland Farm Community. (We are now planning to landscape the traffic island at 34th/Reno and Tilden to match the one at 34th/Reno and Upton.) Removing this traffic island and returning to the raceway would jeopardize both lives and property and destroy a public amenity enjoyed by everyone who travels on Reno Road.

Thank you for considering our views. We are very pleased with the process regarding the Sidwell petition and extremely pleased that the proximate neighbors – led by the Springland

Farm community -- have reached an agreement to reduce the current gridlock, and not add to it. We'd certainly feared a much worse result. The only way now that our fears would be realized is if we get flooded with cut-through traffic through an amendment offered by others who live outside our neighborhood.

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