

A Critical Look at Transportation Issues  
Of the  
Saint Martin's Apartments (PUD)  
116 T Street, NE, Square 3531  
ZC 05-39

By Eckington Citizens for Responsible Development (ECRD)

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My name is Geoffrey Taylor. I've resided at 57 T Street NE, directly across the street from the proposed project site, for about 12 years now. I am immediately affected by this project as I am just about 100 feet from the proposed garage entrance.

I have reviewed the November 10, 2005 Traffic Impact Analysis as well as the February 7, 2007 Memorandum submitted by OR George and Associates and have found many fundamental flaws in their report and I'd like to bring these flaws to your attention. I'll be referencing their Summary of Findings found at Section 5.1 on Page 17 of their Traffic Impact Analysis, which in my testimony I refer to as "the Report". I also make reference to the P-U-D application which I refer to simply as "the Application". I will show you how the findings in the Report contributed to the applicant's planning of a project that will promote ineffective and unsafe vehicular and pedestrian access.

I also make reference to DDOT's January 29, 2007 and February 8, 2007 Memorandum to Office of Zoning.

I will address the following areas of transportation in my testimony: LOADING, PARKING, and TRAFFIC respectively.

LOADING

I want to first direct your attention to the question "what does the applicant mean by "Loading"? At Section 1.3, g), on Page 3 of the Report, it makes mention of "loading/delivery facilities"; then at Section 4.1 on Page 11 of the Report it makes mention of "loading berth with platform"; then at Section 4.6 on Page 16 of the Report it makes reference to "service/delivery".

Text of Testimony.

**[SLIDE 1 – Loading... What is it?]**

According to the definition of “service/delivery” loading space found in Section 199.1 of Title 11 this [service/delivery] space shall *not* be used as a parking space *or* loading berth. Further, Section 2201.1 of Title 11 indicates that there is one required loading berth, *plus* one required service/delivery space. If this is true, then the applicant is asking you to reduce *two* required loading and/or service areas down to about *half* of one space for a building more than *three times* the minimum 50-unit size requirement.

According to Page 9 of the Application, the applicant says you can reduce the size because, in speaking of the occupants of the PUD,

“...such households will only generate a need for *smaller* trucks or transport vehicles.”

Then they make reference to 14’ trucks being confirmed by truck rental facilities as most frequently used by the potential occupants... That is true, if you go to [www.uhaul.com](http://www.uhaul.com), **[SLIDE 2 – U-Haul web page]** you do see U-Haul’s 14’ recommendation. But look at how U-Haul measures it’s 14’ trucks: **[SLIDE 3 - 14’ U-Haul truck]** the 14’ portion of the truck does *not* include all of the front cab. And for the 3-br units, U-Haul recommends a 17 footer **[SLIDE 3 - 17’ U-Haul truck]** but here again that 17’ does not include the entire cab portion.

The applicant testified that the residents of the project are free to load and or otherwise occupy the approximate 30 feet of “driveway” in the public space thus insinuating a 60’ loading area. According to Section 2203.3 of Title 11 use of the public space portion of the driveway is *not* permitted as a matter of right. Practically speaking a typical parking space, which we may know by visiting a local shopping center, is 19 feet in length... and only *one* vehicle will fit into that parking space. Well, 19 feet times two = 38 feet as proposed, that’s about 8 feet into the public space. So if the applicant is saying that 2 of these *smaller* trucks can fit within 30’... they are wrong.

At Section 4.6 on Page 16 of the Report it did say City Lights School attracts significant levels of *trucks* into the neighborhood and I agree! But what loading berth and/or service/delivery area will City Lights use when their existing loading area is removed?

Currently they load from adjacent to the existing parking area – proposed to be removed.

**[SLIDE 4 – Truck and Bus loading at City Lights School]**

The applicant testified that the loading berth will be used for trash trucks; service and maintenance trucks; the landscapers will park their trucks there; and emergency vehicles - which will most likely park on the street. So what about the proposed 178 tenants who may be moving in and out at a frequency directly related to being on a yearly or monthly rental agreement? Can they tandem park in the loading berth as the applicant testified?

**[SLIDE 5 – The proposed loading area size constraints]**

The truck in the following slide **[SLIDE 6 – Mattress Warehouse Truck delivering to a resident of Eckington during school peak PM hour / City Light School’s Trash Container]** is probably larger than the typical moving van that would be used by the proposed occupants. It is very likely that the occupant’s of the proposed apartment building will have mattresses and other furniture delivered to them. It is very likely that maneuvering these “large” trucks into the loading area will prove to be difficult and cause traffic delays/reduced Level of Service. The trash container in this slide is being used by City Lights School. Where will City Lights put their trash when the parking lot (with their trash container) is removed? Trash trucks and delivery trucks **[SLIDE 7 – Picture of a Fedex truck traveling thru the school peak PM hour traffic]** will most likely park on the street instead of trying maneuver into the narrow and shallow loading area. This too will cause traffic delays/reduced Level of Service.

The proposed loading area will create scenarios that will cause traffic, unreasonable accessibility, and safety problems. The lack of sufficient loading berths and service/delivery areas are not adequately considered by the applicant.

**PARKING**

In *Paragraph a), of the Report’s Summary of Findings* it says

“The subject is currently improved with a two-story office building and a 70-space parking garage...”

Even the Application contradicts this at Page 1 by saying

“The site is presently improved with an existing building consisting of seventeen Single Resident Occupancy (SRO) units, an aluminum Quonset hut, the City Lights Public Charter School building, and a surface parking lot.”

It appears that critical base information put into the Report is not only in error but it shows the lack of obvious detail on behalf of the Report’s field reconnaissance.

I concur with the applicant’s count of the 70-spaces. Indeed my count of the empty lot contains about 70-spaces which include one or two handicap spaces and several rows of not 2-tandem spaces as is proposed in the parking garage, but 3-car lengths deep. Now in this slide we have pictures of that lot taken on January 29, 2007 at about 11:30 AM. [SLIDE 8 - City Lights full parking lot] My count was 94 cars on that day. Again the pictures in the next slide [SLIDE 9 - City Lights full parking lot] taken on January 31, 2007 at about 11:30 AM and my count was 87 cars. While my counts may not be corroborated by the angles taken in the pictures, I want bring to your attention the fact that the cars parked on the grass is most likely of a quantity in *excess* of the existing 70-car “surface” parking spaces provided.

In Paragraph c), of the Report’s Summary of Findings it says

“The proposed residential units will be restricted to residents with low and moderate incomes; who will have relatively low auto ownership and tendency to use public transportation services. These will have *positive* consequences for both trip generation and parking demand.”

The application contradicts this point. At Page 3 of the Application, the applicant says that

“In order to *attract* low income individuals, it is essential to provide a building that is constructed to market-rate standards, *particularly with respect to parking...*”

and the applicant further goes to say that essentially, *for these low income individuals,*

*that this is the reason why they are proposing this rezoning. The applicant is admitting that parking, for low income individuals, is one of the chief driving factors as to why they are asking you for permission to grant this rezoning.* But then we read on page 6 of the January 19<sup>th</sup> memo from Office of Planning that the applicant is now proposing that they be granted the option to offer for rent any excess spaces to neighbors or *teachers of adjacent City Lights School*. We have since learned that there exists a written parking agreement with the adjacent school.

On my survey at two separate days and times as previously mentioned, there was an average of 6 cars parked at the convent consisting of 17 Single Resident “formerly homeless” Occupants [SLIDE 10 - SRO cars]. If of 17 of the SRO’s, 6 owned an automobile, then statistically the 50 units set aside for “formerly homeless” occupants *alone* would yield 17.65 automobiles.

At Section 4.5 on Page 15 of the Report it makes reference to demographics as it relates to parking. Since 1960, the U.S. Census has asked American households to report on the number of cars or light trucks "kept at home for the use of members of the household." In the 2000 Census, the District of Columbia tops the list with 36.9% of households reporting no car available.

([http://www.bikesatwork.com/carfree/census-lookup.php?state\\_select=\\*&lower\\_pop=250000&upper\\_pop=999999999&sort\\_num=5&show\\_rows=25&first\\_row=0](http://www.bikesatwork.com/carfree/census-lookup.php?state_select=*&lower_pop=250000&upper_pop=999999999&sort_num=5&show_rows=25&first_row=0) and <http://goodspeedupdate.com/?p=2038>)

Therefore on average in the District 63.1% of the households DO own cars. In keeping with this statistic - if there are *178* households, then *112* of them would own cars.

And while the applicant is proposing 127 spaces, 19 are tandem and 5 are handicap spaces. Either they are suggesting that 19 low income households will have 2 vehicles or they are admitting that their justification of the opposite is flawed.

**[SLIDE 11 - City Lights full parking lot]**

Although my count of the cars parked at the City Lights School averages 90.5 cars during the day, for the sake of discussion, I will use the applicant’s reported 70 cars. My question to you is where do you think these 70+ cars will park *when the existing parking*

***lot is taken away?*** The applicant has not adequately addressed the parking problem.

In Paragraph d), of the Report's Summary of Findings it says

“The design year (2008) “background” traffic conditions considered potential growth in through traffic along the key study area roadways. Based on information provided by the Office of Planning, no background developments are planned for the immediate site area.”

Ok, maybe OP did not provide any other proposed “development” projects but what about renovation and rehab projects? What about the potential projects in these slides? **[Slides 12-15 - Potential projects adding cars and traffic]** The report did not mention the certain parking and traffic impact on the study area by these **82** potential units.

As of the date of the Report, McKinley Technical HS recently opened (Fall 04) with initially only the 9 & 10<sup>th</sup> grades. They have since added 2 additional grades. At 200 students per grade level, the report failed to mention the additional staff parking, the additional pedestrian traffic, and the additional bus traffic all which have adverse impacts on the neighborhood. Although McKinley is currently operating near capacity, according to an article found on page DZ08 in the Thursday, August 26, 2004 edition of the Washington Post there is an additional **66,000** square feet **[SLIDE 16 – McKinley HS's full wing of vacant space]** of still unused space planned for a community college program, a recreation center, and a performing arts center. This will generate **more** parking deficiencies and traffic that the report failed to consider.

Where do you think the parents and spectators park when the Cougars have their football games on the field behind Hyde School; or when folks come out to a community meeting at the Harry Thomas Rec Center; or when there is PTA night at any one of three schools at any given time? There is always spill-over parking onto both sides of T Street. What happens when an emergency vehicle needs to get through this 1-lane traffic? I've experienced coming home during one of these high-traffic events and I have had to literally back down a 10' wide (lane) T Street onto Lincoln road along with at least 5 other cars – with a fire truck trying to get through. According to fire house that serves our neighborhood, the engine truck and the 100' long ladder truck always goes out together on every call. **[SLIDE 17 - Fire truck]**

## TRAFFIC

At Section 3.1 on Page 9 of the Report it says

“...to comply with DDOT’s typical growth assumptions for roadways serving significant through traffic volumes, an annual growth factor of two percent (2.0%) was applied to the existing traffic volumes unto the year 2008. The 2008 base year traffic volumes, reflecting that annual growth, are presented as Appendix E.”

These growth factors are supposed to be added to the traffic volumes existing in 2005. However, when comparing the Report’s Appendix E with the Report’s Exhibit 3 found on Page 7 presenting the existing conditions, the 2% growth factor was only applied to traffic along Lincoln Road. There are no increases shown on T Street or any other street in the study area. As a matter of fact, the Report shows a 15% annual *reduction* of the average peak hour trips for vehicles turning onto T Street from northbound North Capitol Street.

In Paragraph b), of the Report’s Summary of Findings it says

“The defined study area roadway network *currently* operates at quite acceptable Levels of Service, during both the morning and afternoon peak periods.”

Firstly, the study area as per Exhibit 2 found on Page 6 of the Report [SLIDE 18 - Exhibit 2] would have you to believe that T Street is 40’ wide while according to DDOT’s roadway distribution card, it’s only 30’ wide curb-to-curb; the Report also shows that Summit Place is 34’ wide when in fact its only 24’ wide curb-to-curb. I’ve highlighted these areas on the slide.

Secondly, the Report’s definition of peak “periods” found on page 11 of the Report is 6 – 10 am and 3 – 7 pm. The pictures in the following slide were taken during the am peak period, [SLIDE 19 - AM traffic on T Street] and the pictures in this slide were taken during the pm peak period [SLIDE 20 - PM traffic on T Street]. However, according to worksheets found in Appendix C of the Report, the time frames studied appear to have been only 15 minutes (0.25 hours). This sampling may not have gathered the full impact of the real traffic delays. And while the Report only shows operational conditions at intersections, it failed to show operational conditions within the traffic stream, e.g., at the

student drop off/pick up area. Looking at the pictures in the slides, this Level of Service cannot be acceptable.

On Table 1 found in the February 7, 2007 Memorandum submitted by OR George and Associates they update the Level of Service study of two intersections: Lincoln Road @ T Street NE and T Street @ Summit Place NE. They show minimal delays at these intersections during peak hours. Please be advised that during school hours, thus peak hours, traffic is diverted *away* from the Lincoln Road @ T Street NE *intersection*. Be further advised that the one-way eastbound traffic does not have a stop sign at T Street @ Summit Place NE *intersection*. The traffic delays occur between the two intersections – this is being overlooked and therefore rendering an unjust view of where the traffic delays are actually occurring.

The Report says on Page 4 that T Street *currently* serves approximately **2,450** vehicles per average weekday! Well, that's an average of **103** vehicles per hour on a weekday. [SLIDE 21 – Average weekday vehicular traffic] There appears to be a contradiction here. Why does the Report's exhibits and conclusion reflect *less* numbers during *peak* hours?

Finally, the Paragraph b), of the Report's Summary of Findings says

“...accident records indicate no significant safety deficiencies.”

The accident records do not make that conclusion. *Someone* had to interpret the accident records and make that conclusion. You will find injuries in the accident records. How can *someone* conclude that someone else's injuries are insignificant? Also note: There are several accident records missing from the Report (Lincoln & T Street for year 03, and Summit and Todd Street for year 02). You will find accidents amongst these missing records.

At Section 2.2 on Page 5 of the Report it says

“The Hyde Leadership Public Charter School implements traffic control measures on school days...”

The traffic was not acceptable to the residence of the community! In a conversation with

Captain Scott of MPD, who serves our neighborhood, he said that when the 3 schools were at capacity, there were more and more school buses turning from Lincoln Road onto T St. The presence of those school buses and the parents dropping their children off was making it impossible to turn onto T St. Officers then started directing traffic and setting up cones, and eventually DDOT came out to inspect the location, and they determined that it was necessary to enforce a one-way restriction in the AM. Capt Scott said that the MPD was asked by the Edgewood Civic Association to address this issue at one of their meetings, as well.

In Paragraph e), of the Report's Summary of Findings it says

“The proposed development will generate an average of fifty-one (51) vehicle trips during the morning and afternoon peak hours. These trips would be well distributed (directionally) resulting in minimal impacts on the study area intersections.”

The Report justifies this by saying at Paragraph (ii) on Page 16 that the majority of traffic during morning peak hours travel west and then south and only a small percentage of trips travel and I quote *“through the main student drop-off area”* According to DDOT's January 29, 2007 Memo, you will know that it's illegal to travel west on T Street from the proposed project during these times. The Report's conclusion of this matter found in the last paragraph of Page 16 says that there would be no adverse impact on the existing student drop-off/pick-up operations. Well if you can't travel west during the morning then by the applicant's own admission the contrary is true and there *will* be an adverse impact on the surrounding area.

**[SLIDE 22 – Kids crossing T Street during peak hours]**

**[SLIDE 23 – Kids and traffic do not mix]**

The last few paragraphs of the Report are basically conclusionary remarks that the applicant would like for you to believe. We believe that the whole traffic study is built upon egregious and inconsistent errors.

I'd like to bring my testimony toward a close by showing you that there is no easy way to explain how such an influx of the proposed number of vehicles will not have an adverse

impact on the surrounding neighborhood.

**[SLIDES]**

- 24. Proposed parking garage layout showing the egress point (ENLARGED)**
- 25. Proposed parking garage layout on egress onto T Street (SHOWING AREA)**
- 26. Proposed parking garage with the most probable optional egress points**
- 27. Proposed Entrance (West side on T)?**
  - a. The Report says avoid traveling through the main student drop off area;**
    - i. [SLIDE 28.] shows the student drop off area surrounds the proposed entrance, both to the east and to the west.**
  - b. Cannot travel to the west during peak periods;**
  - c. DDOT recommended relocating the entrance.**
- 29. Enter on East side on T?**
  - a. Cannot pass through the new location of the convent.**
- 30. Enter on West side on Todd?**
  - a. Single 8' Lane w/ two rows of parked cars;**
  - b. Will cut through the "School's 1200 feet work shop – that appears to be the logical access point for teachers to walk next door to Hyde School.**
- 31. Enter on East side on Todd?**
  - a. One-way cars will stack up at Summit;**
  - b. Applicant's traffic consultant testified Todd not good.**
- 32. Enter on Summit?**
  - a. The traffic study indicates that Summit currently serves an average of 50 vehicles every hour. Think about it... the architect designs a 10' wide driveway in a building that is supposed to not have traffic, then exits the building with a 12' wide driveway... then you have to maneuver onto an 8' wide two-way lane with oncoming traffic. This is not a safe scenario.**

My questions comments and concerning *DDOT's January 29, 2007 Memo:*

- DDOT indicates that the "loading berth" set back of seventeen-feet from the sidewalk provides enough room to accommodate a tractor trailer without blocking the sidewalk or roadway. Is DDOT aware that a portion of that space is public space?

- Is DDOT asserting that parking of such vehicles in public space is a matter of right?
- DDOT corroborates with the traffic consultant's acceptable Level of Service at an intersection but failed to mention the Level-of-Service at the proposed garage entrance, is DDOT not concerned with the Level-of-Service at points between intersections?

My comments and questions concerning DDOT's February 8, 2007 Memo:

- DDOT concludes, after its prior recommendation to relocate, that placement of the parking garage on T Street, NE will not conflict with traffic safety improvements recently implemented in the area, provided the applicant seeks certain traffic calming measures, which includes stop signs on private property at the garage exit and coordinating with DDOT to place stop signs at T Street at Summit Place. Isn't DDOT aware that the placement of the stop sign on private property would essentially be at a point where vehicles are still inside the garage?
- Isn't DDOT aware that most responsible drivers would probably stop there anyway and that the real traffic impact occurs at the point the driver desires to proceed into an already heavy traffic pattern during the peak hours?
- Isn't DDOT aware that the placement of the stop signs on T Street will have a negative impact on the Level-of-Service since it was here-to-fore not anticipated?

I want to add that the Report makes reference to a Traffic study Scoping Agreement with DDOT as Appendix A. I looked for it and its not there. They did not adequately explain the methodology they used to determine the scope of the study area. What about problem areas between intersections; and problem intersections like the high traffic at Eckington & Florida; or the forced east-turn traffic from Summit onto Rhode Island?

Our conclusion as it relates to loading, parking and traffic is that we ask you to require an independent non-biased traffic study be completed with a scope of work approved by DDOT and ECRD and have a copy of the new report provided to DDOT, ECRD and the residents of the affected neighborhood and allow all of the involved parties to evaluate and have sit down discussions about the *real* traffic impact on the surrounding area and then have opportunity to make our comments known to you *before* you authorize this PUD to proceed. Thank you.



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**Geoffrey Taylor, Author**