BEFORE THE BOARD OF ZONING ADJUSTMENT
0F THE DISTRICT OF COLUMBIA

Application of St. Patrick's Episcopal Day School for a Private School at 4925 MacArthur Blvd. and Ashby St.

BZA Ap. No. 16852
Public Hearing: April 16, 2002
ANC 3D

RECEIVED
D.C. OFFICE OF ZONING
2002 APR 11 AM 8:43

OPPOSITION TO THE APPLICATION

I.

IDENTITY OF RESPONDENTS

We are three "adjoining and nearby property" resident owners and neighbors of the subject site at 4925 MacArthur Boulevard, located either across the street from the property entrance or behind the property. We received a notice, dated February 28, 2002, from the BZA of the filing for a Special Exception, and we have requested standing in this matter: Alma H. Gates, residing at 4911 Ashby Street, N.W.; K.Van Sickle (also know as Tina DeMallie), residing at 4923 Ashby Street, N.W.; and Nancy L. Feldman, residing at 4911 W Street, N.W.

This matter has moved very rapidly. Our first notice of the school's plan was a mailbox stuffer, delivered in early December 2001 (found at Tab Q of Applicant's Statement), which many neighbors rather overlooked in the holiday crush, while others thought it was a *fait accompli* because it didn't mention that approval was required. There were then several community-group presentations that were conceptual in nature, not providing any specifics regarding traffic, parking, architectural changes or other responses to anticipated impacts.

BZA
Case No. 16852
Exhibit No. 152

Board of Zoning Adjustment
District of Columbia
CASE NO.16852
EXHIBIT NO.152A1

As the potential for major neighborhood disruption became apparent, Mrs. Gates submitted a set of questions to the school, which was not responded to until January 22, 2002 (and then only in part), still in a general manner with traffic and architectural proposals to come at some later indefinite time.

Finally, by late February / early March, neighborhood concern had risen to such a level, and the official hearings of the ANC and BZA were so close at hand, that we decided to sound out the residents of the other properties (33 in all) within 200 feet. This effort evolved into the Petition, the original of which is to be presented to the BZA at the April 16, 2002 hearing, and a copy of which is at **Tab A** of this submission. It evidences that residents of 31 of the 33 properties strongly oppose the application (the other two expressing neutrality). The text reads:

PETITION TO THE BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16852 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

"We, the undersigned, neighbors of the premises at 4925 MacArthur Boulevard, NW, strongly oppose granting St. Patrick's Episcopal Day School a "special exception" from the existing low-density (R-1) residential zoning for a private junior high school. The proposed use would significantly intrude on the quiet residential character of narrow Ashby Street and the surrounding neighborhood, and create serious problems regarding noise, traffic, number of students, safety and parking. Furthermore, the property, which is less than half an acre in total, would not support any athletics or other normal outdoor school activities, necessitating the over-use of community resources. And finally, a favorable response to this application would be in derogation of the zoning ground rules applicable to residential use and the expectations of the surrounding homeowners, would lower affected property values, and would encourage others to acquire small residential parcels in our neighborhood for unauthorized activities on the expectation that they could effect a conversion at a cheaper total price than buying properly zoned premises, as the applicant has admitted is the case here. For these reasons and other conditions, all of which will be described in detail by the opponents at the BZA hearing, we advise you that the proposed use is overwhelmingly objectionable to adjoining and nearby property, and ask you to reject the subject application."

In early March, after having received our BZA notices and instructions, a number of us filed requests with the BZA for party status. We anticipate putting together a group by the time of the BZA hearing on April 16, at least from among adjoining and nearby neighbors who requested standing, in order to simplify the party status. We have retained a traffic expert, Joe Mehra of MCV Associates, see **Tab B.** And, we can assure the BZA that this Reply does reflect the opposing neighbors' objections, as summarized in the Petition, although we expect that you will receive additional communications from our neighbors on these and other points.

II.

NATURE OF RELIEF SOUGHT BY THE APPLICANT

St. Patrick's has requested a Special Exception in order to place a junior high school with 60 students and 12 teachers on a residential property of less than half an acre, in a purely residential block with a low-density zoning of R-1-B. The school has sought to characterize its proposed use as a continuation of previous educational programs, but its plan would be far more intense and intrusive than any previous use.

In 1961, after many decades of residential activity, the property was approved (for a two-year trial period), at the request of the U.S. State Department, as a private school site for 25 children of the diplomatic staff of the German Embassy with a resident married couple as teachers. Appeal #6335, June 21, 1961. The school soon thereafter requested an increase of 50 children, which was turned down on the grounds that it would be objectionable to adjoining and nearby property because of noise, traffic and number of students, and further that it would not be in harmony with the general purpose and intent of the Zoning Regulations and maps, and would tend to affect adversely the use of neighboring property. Appeal #6830, July 24, 1962.

In 1963, a Special Exception without an expiration period was granted to the Washington Psychoanalytical Institute and Society, to conduct post-graduate classes for physicians. The proposed activity was described as Saturday morning classes of small groups, a twice-monthly evening class of fewer than 10 students, no summer classes, twice-monthly administrative meetings and an occasional committee meeting; three administrators on the premises during the day; and a medical library available to the students and faculty.

The BZA found that "[i]n general, the activities of this medical organization are **extremely quiet and are less than that which would occur in many private homes.**" It ruled, in favor of the appeal, "that in view of the limited use of this premises by appellant that it is not likely to become objectionable to adjoining and nearby property because of noise, traffic, number of students or otherwise objectionable conditions. **This position is further substantiated by the fact that there was no objection to the granting of this appeal by persons residing in the neighborhood.**" (Emphasis added in both sentences.) Record of the proceedings at Applicant's Tab F.

Contrast that with the notion of 60 adolescents, 12 teachers, various visitors, parent volunteers, tradesmen, maintenance personnel, etc., commencing at 7 a.m. and continuing throughout the day, all year long. (See **Tab C**, a comparison of the Psychoanalytical Institute's approved use and St. Patrick's proposed use.) And unlike the medical group's application, this one is overwhelmingly objectionable to "persons residing in the neighborhood". See the map at **Tab D**, in which the red dots signify adjoining and nearby property (those within 200 feet) who signed the petition opposing the school's plan, the yellow dots show the neutrals, and the blue dots represent residents just beyond the 200-foot boundary who wanted to sign in opposition, so we provided separate pages for them, at **Tab E**.

And even though the Psychoanalytical Institute's use of the property was expected to be "extremely quiet", it has not been without its problems for the neighbors. To the extent that its use now is greater than was anticipated in the 1963 BZA Order, we have an example of what happens after Special Exceptions are granted and the grantor (the BZA) loses jurisdiction. To our knowledge, no institutional user in the District has had its "special exception" certificate of occupancy canceled or been otherwise seriously penalized for incrementally changing the game plan after approval, other than possibly having a more difficult time securing additional approvals. The neighbors are therefore pleased that a change of ownership presents the opportunity to have the property restored to residential use.

We were advised that there were two rounds of bidding on the property and the other bidders were residential uses, including several who indicated that they wished to retain the existing structure. But the neighbors would be comfortable even with a plan to build three residences (the maximum, given the 50-foot minimum-width requirement of R-1-B, and a site measuring 150 feet in frontage and 140 feet in depth), because that would result at most in perhaps a dozen residents, half a dozen cars and a few pets. Such a configuration would be consistent with the existing quiet and private character of the neighborhood, "intended to stabilize the residential areas and promote a suitable environment for family life." 11 DCMR §200.2.

It is our position that no conditions, covenants, "parent contracts" or other patches can overcome the extreme unsuitability of this property for a junior high school. St. Patrick's put it well in its 1998 advisory to parents (at Applicant's Statement, Tab G, top of page 5): "Middle school students need an expanding world: greater independence, rigor and choice, larger spaces..." [paragraph 5]; "classroom space, playing fields and athletic facilities, specialized science labs, additional library and technology space..."[paragraph 6].

As they said, a middle school addition would require "plenty", most of which they felt they didn't have at their capacious Whitehaven campus, and most of which will not be found at 4925 MacArthur Boulevard at Ashby, either.

And yet to hear these officials now, their 7th and 8th (and 9th) graders would be confined to the premises, and not allowed on the Boulevard or the local streets unchaperoned; bundled into buses for outside activities, and programmed to board and/or disembark an entire shuttle bus in one minute flat; ambling around the modest back lawn during the occasional break, or sitting sedately eating sandwiches and carefully disposing of the refuse in attractive trash receptacles. No basketball hoops, loud music, shouting or general boisterousness, definitely no hopping over the fence or poking the expensive landscaping.... Those of us who have lovingly raised (and survived) adolescents sincerely hope this is only ignorance on the part of officials who have not yet dealt with teenagers, and that these youngsters will be diverted to a more removed setting where they can stretch their limbs and possibilities. Otherwise, they will be bursting out of the seams of that cramped Victorian structure and disrupting the tranquility of Ashby Street and environs.

III.
ZONING HISTORY OF ST. PATRICK'S

St. Patrick's is no stranger to the "special exception" application. It twice was turned down for expansion at its original Foxhall Road location because of neighborhood objections, and has been before the BZA as recently as December 1999 for expansion of facilities at its Whitehaven campus. At that time, the school emphasized that it was seeking no increase in number of students or grade levels, see Remarks of Peter Barrett, Head of School, to the BZA, Dec. 8, 1999, at **Tab F**.

By December 21, 2000, the school was announcing its new 7th and 8th grade expansion. See Applicant's Statement, Tab G, pp. 1 and 2. And significantly, it characterized this expansion as an element of "a city-based, city-focused, middle- and upper-school program, located on another site, that would extend to the secondary school St. Patrick's mission..." This 'combined new campus' approach is continued in the announcement, e.g. "there is a determination now to view Grades 7 and 8 in the context of a possible expansion to the secondary-school level." That was how St. Patrick's explained to its people why it had changed its mind so quickly about higher grades: the earlier decision had been to reject a middle-school addition only, and the new thinking was (despite some bet-hedging) to embrace grades 7 through 12 ("... which was never considered in that earlier discussion").

These acknowledgements are critical to the instant application. We are not surprised that schools, like other institutions, want to expand; it is their natural proclivity. But St. Patrick's is not just locating a home for grades 7 and 8, and its further references to "starting off" its junior high in an urban setting (recent advertisements), and a covenant that would extend only so long as the school were to remain at Ashby Street, see Applicant's Statement, Tab O, strongly suggest that its presence in our neighborhood would be of brief duration, only until it locates and builds an upper-school complex. Thus, we are being asked to have the whole residential block and surrounding areas compromised, and spend time on continual vigilance and monitoring, defending against non-residential uses at that site and adjoining properties, just so that St. Patrick's can have a place to hold its middle school for a few years until the appropriately larger site is up and running.

IV.
DESCRIPTION OF THE NEIGHBORHOOD

The site of the proposed junior high school uses a MacArthur Boulevard address, but its driveway access is on Ashby Street, a short, narrow, quiet residential passageway in the heart of The Palisades with 10 homes, a partial sidewalk on one side of the street (at the Applicant's site), and curb space for about 21 small or medium-sized cars. Our section of the Boulevard exemplifies the Ward 3 feature of small retail clusters punctuating long segments of residential development. The square and the surrounding blocks are limited to single-family detached homes.

MacArthur Boulevard is an minor arterial roadway, but Ashby, 49th Street, W Street and the connected streets are small, effectively one-lane with few sidewalks, and completely residential in nature. The neighborhood does not have a complete grid system of streets; in fact, W Street is the only nearby road other than Whitehaven Parkway (where the applicant's main campus is located) that connects Foxhall Road and MacArthur Boulevard, the two minor arterials in the neighborhood and the source of great congestion because of commuter traffic, from both workers and students' families. This traffic congestion results in diversion of both through traffic and local residential and commercial traffic onto the small residential streets that are not designed to handle such a heavy load. Just recently, the neighborhood was able to obtain stop signs to improve safety and discourage commuter short-cuts at Ashby, 49th Street and W Street from Foxhall to MacArthur.

There is no Metro (subway) station in The Palisades. The public buses run fairly frequently, but do not appear to be utilized by St. Patrick's students. The closest traffic light is at V street and MacArthur Boulevard. There is no zoned-parking program in the area.

The demographics are a mix of family ages and types, but quite a few residents have been in their homes for decades. We have many retired people, and also residents who work at home, such as writers and artists. It is an extremely quiet neighborhood, notwithstanding the ambient sound of Reagan National flights and traffic on the Boulevard.

V.

THE APPLICANT IS NOT ENTITLED TO 'SPECIAL EXCEPTION' RELIEF UNDER THE ZONING REGULATIONS

The Applicant asserts that it is entitled to a Special Exception because the proposed use is compatible with the zoning classification, and that it is in harmony with the general purpose and intent of the Zoning Regulations and Map and will not adversely affect the use of neighboring property. We, on the other hand, believe that this is a "bright line" case for denial of a Special Exception.

Unlike so many applications that have come before the BZA in connection with private schools in residentially zoned areas:

- the zoning is low-density R-1, not the high density R-4 or R-5 that may accommodate large student counts amid apartment high rises, multi-family rowhouses, and institutional uses;

- the block and surrounding blocks are entirely residential, not already mixed use, so the proposal would constitute "spot zoning" and residential block-busting;

- the site is 0.48 acre in total, not a large estate or other sizeable tract suitable for 60 adolescents, 12 instructors and support personnel;

- the application is for a new location for a school, not an existing school's presence or expansion, so that the BZA is not confronted with the need to make the best of a bad situation;

- the Applicant's proposal is so different in character from the previous educational uses as to require a completely fresh assessment; and

- the property has not been retro-fitted to preclude its residential use.

In addition, the proposed traffic "fix" for the new use depends upon a new, untried (and as yet undetailed) plan on a separate campus, to reduce a current problem caused and exacerbated by the Applicant and not addressed until this application, and such other ineffectual and unenforceable devices as parent carpool contracts and covenants. And lastly, the adjoining and nearby households and the ANC are overwhelmingly opposed to the application for the many harms they feel it would cause to this quiet, older neighborhood.

To meet its burden under 11 DCMR §1304.1, the Applicant must demonstrate that the proposed private school use is in harmony with the general purpose and intent of the Zoning Regulations and Maps. The regulatory definition under 11 DCMR §200.1 provides that "[t]he R-1 district is designed to protect quiet residential areas now developed with one-family detached dwellings and adjoining vacant areas likely to be developed for those purposes." This perfectly describes the site and its surroundings at issue. Subsection 200.2 of 11 DCMR goes on to say, "The provisions of this chapter are intended to stabilize the residential areas and to promote a suitable environment for family life. For that reason, only a few additional and compatible uses shall be permitted."

The Applicant reminds us that "[i]n general, uses of land for educational purposes are highly favored", p. 10 of Applicant's Statement, but that just begs the question of where such uses should appropriately be located. The Palisades is known as a hospitable environment for public and private schools; we currently have five junior high schools, including Hardy, a public school, and Georgetown Day, Our Lady of Victory, Lab School and the newest entrant, Field School. What all of these have in common is a commodious use of space and other appropriate physical resources for their students.

What type of private schools might be compatible with our quiet and sedate immediate neighborhood? Perhaps a school conceived and initiated by a group of the neighbors for their own families' use, or a resident offering small classes in music or art, or language tutorials. In other words, something "limited" and no more intense than the surrounding family activity.

Public schools are allowed in neighborhoods as a zoning "matter of right" because they serve the immediate community. St. Patrick's proposed junior high school would be regional, and give no special treatment to Palisades families (as school officials testified at the ANC 3D meeting of April 3, 2002). Almost 40 percent of the students in the school's current grades don't even come from the District, and it has refused many times to disclose the number of its students residing in The Palisades' sub-neighborhoods (Berkley, Kent and Palisades), providing only zipcode data, which also cover Georgetown, Spring Valley, Wesley Heights, American University Park, etc. Of course, the school has the students' home addresses, and could easily determine how many live here.

Section 1304.1 also requires the Applicant to show that it will not adversely affect the use of the neighboring property in accordance with the Zoning Regulations and Maps, and that it meets the special conditions in Subsections 206.2 and 206.3 for private schools.

Subsection 206.2 provides that "[t]he private school shall be located so that it is not likely to become objectionable to adjoining and nearby property because of noise, traffic, number of students, or otherwise objectionable conditions." Admittedly, this is a difficult standard for the Applicant to meet in the context of neighborhood hostility to its proposal. If the regulation's drafters had meant that the described objections could be raised or rebutted equally by anyone, they could have left out the reference "to adjoining and nearby property". And if they meant that the objectionable result would have to be a certainty, they could have left out the phrase "likely to become". The plain meaning of Subsection 206.2 is that the neighbors' reactions and concerns, even if not shared by others, are very important in the determination of the Special Exception.

What we all can read into the regulation is a "reasonableness" requirement. But again, we would respectfully ask the BZA to consider carefully the text of §206.2, as well as the practical effect of permanence that often follows approval of a Special Exception, and review the factors in the light of "not unreasonable"; that is, if a Board member personally would not mind certain effects of the proposed use, or feels that the neighbors might be over-reacting on some point or are too cynical about promises made by the Applicant to ameliorate certain conditions, but recognizes that it would not be unreasonable for the neighbors to have such concerns, then the proposal should be rejected. In this case, an ounce of prevention would be worth many pounds of cure.

VI.
SPECIFIC FACTORS OF CONCERN

A. Traffic

At this time, we do not yet have specifics regarding St. Patrick's transportation plans for the junior high students. Upon receipt (if occurring before the BZA

hearing on April 16, 2002), we will consult with our traffic expert. The traffic analysis at Tab K in the Applicant's Statement is essentially the one provided to the community on February 21, 2002, and contains the results of field testing on one day in mid-December 2001, and a summarized series of alternative approaches and general recommendations. We will present testimony regarding traffic impacts at the BZA hearing on April 16, but would like to offer some comments here, based upon our preliminary researches and common sense.

In terms of vehicular traffic, the school estimated that the proposed junior high school would generate about 46 round trips for 60 students, plus 12 round trips for faculty and three round trips for visitors. (We think those figures are low, if one considers non-faculty staff, parent volunteers, suppliers, maintenance personnel, various contractors and repair people, prospective students, etc.)

St. Patrick's proposes to relieve Ashby Street and environs by eliminating all student traffic, at least. They propose to require parents to drop off and pick up their children at the Whitehaven campus. There is a carpool alternative mentioned for direct access to MacArthur/Ashby, but it would be limited to a minimum of three junior high students, not the more likely arrangement of several children of different ages from one or two families, so that is probably not a viable alternative (the traffic report estimates "0 to 3" such carpools).

Assuming for the moment that parents would actually comply with such a request, what might be the impact of shuttle bus trips on the neighborhood?

To begin with, St. Patrick's counsel has suggested, see Tab L in Applicant's Statement, that WMATA informally would have no problem accommodating the school's buses in the public bus stop on MacArthur. However, all that really was meant is that such bus service cannot interfere with regular bus service. See **Tab G,**

our traffic count on a recent day of buses and other vehicular traffic at or near that bus stop from 7:30 a.m. to 8:00 a.m. There is no way that shuttle buses would not be interfering with the frequent bus service and other traffic in that lane. And bus pad occupancy is not the only issue here: the neighbors on MacArthur Boulevard legitimately fear that their driveways and parking in front of their homes would be blocked by buses, carpools, visitors and tradesmen, etc., lined up behind the buses, and other school-related congestion.

We also note that St. Patrick's advice was prefaced by an assumption that the shuttle bus trips would be two or three, with not more than 20 students each, and unload in one minute. See **Tab H**, setting out the District's requirements for school buses, including flashing lights and other steps to be taken at stops. And, let's remember, we are talking about teenagers. In addition, if parents were attempting to drop off children on Whitehaven at the height of rush-hour, one would have to assume that there would be delays, etc., and the most likely scenario is that the school's bus "fleet" would make a number of round trips each morning, picking up stragglers and delivering them to MacArthur Boulevard.

And finally, we are not just speaking of morning and afternoon round trips. Because the site is so physically limited, the school has advised that students will have to go elsewhere for gym and all sports/athletic activities, clubs, library, science labs, chapel, and unspecified "special events". The shuttle buses would continue looping through the neighborhood all day long.

All of the above assumes that the parents would honor the school's directive to deliver the junior high students to Whitehaven. That depends in part on how smoothly the Whitehaven operation proceeds. We can only look to the past as prologue, to speculate on whether the school's latest plans have a chance of success.

It turns out that, **in the last 10 years, St. Patrick's vehicular traffic on Whitehaven has increased threefold** (from 116 to 338 cars per morning commute, or 3.2 children to 1.3 children per car), **with no increase in student numbers.** See **Tab I.** During that time, the school has made no effort to ameliorate the problems, even though it has been the dominant traffic force on Whitehaven, see Applicant's traffic analysis, Tab K at p. 27. In its submission to the BZA in December 1999, requesting permission to expand facilities and reconfigure its Whitehaven campus, the school made many promises and optimistic projections regarding the anticipated improvement in the traffic situation, at **Tab F**, above, at pages 2 and 3; but after they secured their BZA approval, things quickly became even worse.

In the most recent proposal, sent to us on April 8, 2002, by the school ("Dismissal Carpool Program", at **Tab J**), they express their intent to increase average student occupancy per car from the current 1.34/1.39 to 1.59. But, this figure is merely the number needed to show that adding 60 students to the current Whitehaven congestion will not increase the total number of vehicles. In other words, it is completely hypothetical -- determine what number would give you "0 increase", and then announce it as your goal! There is nothing in this latest plan that would give one confidence the school could actually make that number.

In contrast, page 30 of the Applicant's traffic analysis (also replicated cat **Tab J**, above) is more realistically indicative of the lack of success the school has had in enforcing any of its traffic-related directives. At the very top of the page, it concedes that half of the parents turn right and exit Whitehaven onto Foxhall in the morning, even though the official school policy is to turn left towards MacArthur. Even worse, look at the description that follows regarding car occupancy rates, which concludes that the number of students per car roughly equalled the number of students per family, i.e. no one actually carpools despite frequent admonishment by the school. On page 38, it is conceded that the school would have to "compel"

carpooling to make it happen. There is no explanation in any of the school materials that we have seen to indicate how that would be accomplished.

A further major traffic complication on Whitehaven is the advent of the new GW/Mt. Vernon entrance there. See letter from GW, at **Tab K**, describing the massive schedule of shuttle buses, faculty and staff vehicles, vendors, parking garage access, and the complex coordination needed with St. Patrick's to accommodate the new traffic interface. There is also the issue of coordinating with the 100 staffers at the Lab School on Whitehaven, a number of whom now park on public streets that would be off-limits under the proposed St. Patrick's/DPW plan.

It seems obvious that, faced with enormous congestion due to various schools on Whitehaven and rush-hour complications in parents' schedules, many if not most parents would simply drop off their children either at MacArthur or Ashby or, if they were trying to be discreet, on 49th, 48th, W Street, etc. Neighbors' experiences with St. Patrick's parents and their vehicles on V Street, behind the school's current rented space for the junior high program at commercially zoned 4880A MacArthur Boulevard, plus the spectacle of them turning around in W Street driveways in order to face the right direction before or after their Whitehaven drop-offs, leave us with no illusions about how it would work. But harried parents at any school will not be at their best under such circumstances.

What we are saying is that the proposed "conceptual" traffic plans are not well thought out, are unlikely to work, and that for purposes of decision-making in this Special Exception proceeding, a "worst-case scenario" is entirely appropriate. Ashby Street traffic is pretty much at capacity now in the mornings, and is one-lane almost all the time. Even a dozen or so extra cars, especially with some of them pausing at the corner, would effectively close down the street and block all of the driveways, and the same would be true for 49th Street and parts of W Street.

B. Noise

Rather than testing for noise at the site and at another school, it would have been more helpful to simulate junior high school noise and then to test at the neighbors' houses and backyards. Our blocks are part of an urban neighborhood, with 33 households within just 200 feet of the site. As it is, everyone must be solicitous of each other because sound travels, and it doesn't have to go far.

And this noise would start early, at 7 a.m. as teachers and staff arrive, and then as children are transported. Even if they did come by shuttle bus, the Applicant's sight plan SP 1.0 at their Tab A shows that their route from the bus to the door would take them along a 60-foot path down the perimeter of Ashby and only 12 feet from the street; that is, they would be walking parallel to Ashby Street, albeit 12 feet in from the sidewalk. There is no entrance to the building on MacArthur.

And there is no practical way to muffle such noise. **Tab L** contains a discussion of buffers and an earlier version required of St. Patrick's at Whitehaven in 1983 and reinstated in 1999. There is also an insert at that Tab superimposing upon the Applicant's drawing of the property the space that would be taken up by a "buffer" of plantings or other sound-deadening materials, with a depth of 13 feet. That is less than the depth required as part of the school's Whitehaven reconfiguration, to protect the residential property adjoining the gymnasium. In this case, it would displace up to eight parking places and still offer inadequate protection, particularly to the property that is 33 inches from the site's parking lot.

Tab M is part of our picture gallery. These shots demonstrate how close the site is to the adjoining properties, keeping in mind that much of the open space the Applicant touts is actually parking lot. **Tab N** is an eloquent statement from one of the adjoining owners in this vein, to indicate his distress at the proposal.

William E. Stone, M.D., a child psychiatrist and behavioral expert who lives on 49th Street, has advised us, "The assertion that sixth and seventh graders will not be noisy is patently absurd. Not only are they noisy, but they should be! Early adolescence is a time of enormous change and pressure. Boys, in particular, need opportunities to discharge pent-up energy and should not be hampered in their pursuit of healthy expression of that energy. The school officials are being disingenuous in their assurances that 60 or more students in the house and on the grounds will not be disruptive to the surrounding neighborhood."

C. Privacy and Safety

The elements that would contribute to noise and disruption of neighborhood tranquility, particularly the proximity of such intense uses, would also create intrusion into the privacy of family life. In the back of the property is a 12-foot drop in elevation, with a direct sight line to the adjoining yard. There is an attractive swimming pool, and inviting gardens and pathways beckon nearby. The pictures at **Tab O** are included to provide more visual evidence of the closeness and lack of natural barriers between the properties.

Air pollution on peoples' decks and wafting across their gardens from the car exhaust fumes in the parking lot would be a constant. The lack of sidewalks would present vehicular safety issues for the students and the residents.

D. Parking

Subsection 206.3 requires "ample parking, but not less than required." The Applicant asserts that it has 15 spaces currently at the site, and only needs seven under the District's parking requirements. But this position bears little resemblance to reality or practicality.

Tab P describes Ashby Street and provides a photograph of it on a typical day; the street parking spaces are filled. The school's current Ashby parking lot configuration would not take into account any buffers (which it admitted, at the ANC meeting, would take up parking spaces), handicap space, emergency vehicle access or turnaround, or space for trucks, maintenance vans or other commercial vehicles, not to mention the visitors, parent volunteers, prospective students, suppliers, special guests, etc., who would naturally be in attendance as part of the school's activities. Nor would it accommodate the inevitable building-out projects or ancillary uses.

There is also the fire-lane issue. **Tab Q** holds a correspondence with DCRA's Fire Protection Engineer, to correct what we believe to be a mis-impression regarding fire lanes from an earlier letter by Applicant's counsel. Briefly, only the Fire Marshall can designate a fire lane. Even though the "official" access point would be MacArthur Boulevard, because it follows the street address, the Marshall could decide later to designate the more convenient driveway/parking lot as a fire lane. That could remove four or five parking spaces.

St.Patrick's for many years has boasted of its capacious off-street parking, comfortably more than required by law. But its "family" has tended to subsume those areas and everything else in sight. **Tab R** contains two pictures; the first is Whitehaven in front of St. Patrick's during a school day, and the second is Whitehaven in front of St. Patrick's on the first day of spring break. And see Applicant's Tab K at page 35, where it is conceded that even many of St. Patrick's faculty members do not use the off-street parking provided for them, preferring to park on the street. We have to assume that this institutional culture, and the impulse of most people to do the easiest thing, particularly in someone else's neighborhood, would cause similar incursions on Ashby Street and its environs, especially if "tandem" parking were allowed, as described in Applicant's conditions.

In all of its transportation plans, St. Patrick's includes the vision of its children walking to school. If that were true in any material respect, then where are all of these cars coming from?

E. Number of Students

It is our position that 60 adolescents, 12 teachers et al., are much too great a number to be at what is essentially a biggish house on a biggish lot in a quiet neighborhood. Nothing could be less likely "to stabilize the residential areas and to promote a suitable environment for family life." See **Tab S** for a visualization of the volume of the proposed future student body and staff.

The Applicant's design plans do not yet contain dimensions (at least that we have seen), and contain material anomalies, such as the fact that they show the property at 150 x 150 feet when it is really 150 x 139.6, and the central fireplace mysteriously disappears in the second- and third-floor drawings. But the plan to stack another porch over the existing one, to build a science lab in the attic and turn an office into a classroom, only point up the inadequacies of this structure for the proposed use. Various health and safety additions, building-out of the structure, steps and a path from MacArthur, a ramp, and widening of the driveway, all appear to be needed. And there are no sports facilities, and not enough outside space to throw a frisbee. Altogether, this appears to be a jury-rigged attempt to convert a spacious but ordinary residence into an intense use.

School officials have said how delighted they will be to take full advantage of the fine public resources in our area, including the parks, athletic fields, recreation facilities and library. Of course we all share resources, but the ones financed by taxpayers are meant primarily for the public, and there is something unseemly about a private school not having and using at least some of its own facilities, seeing as it would be taking the property off the tax rolls and thus not contributing at all to those local public resources it delights in "sharing".

All of these impacts would "tend to affect adversely the use of neighboring property". It is a particularly acute issue for those who work at home or spend a lot of time there during the day, and the older and chronically ill among us. And these impacts would inevitably have an adverse effect upon the property value of the nearby homes, notwithstanding that having nice schools in the area may increase the value of those living outside the line of fire.

Realizing that it has lost the neighbors' trust due to its frequent position reversals, and after advising that legally it could put up to 88 students at the site, St. Patrick's has offered the neighbors a "covenant" to hold its number to 60. Please note, at Applicant's Tab O, numbered paragraph 1, that the school only offers to maintain the 60-student cap "so long as St. Patrick's shall operate a school on the property." Thus, if, as we suppose, the school were to move the junior high to an upper-school campus in a few years, another school tenant could go for higher numbers (and changes to any other substantive items that might be added to the covenant), as could a buyer. By then, the neighbors would be hard-pressed to try to get the property restored to residential use. See **Tab T** for more information as to why in any event a covenant of the sort offered would not be useful in this context.

But make no mistake, waving an even higher number (the litigation ploy called "a parade of horribles") does not make a 60-student use any more palatable. And most of the proposed conditions (at Applicant's Tab R) would be inherently or practicably unenforceable. Either we are going to be saddled with an institutional educational facility, and no realistic, implementable or enforceable operating restrictions, or we are going to preserve our neighborhood's tranquil, low-density residential characterization.

Conclusion

As ANC 3D unanimously concluded at its meeting on April 3, 2002, the proposed school would be inconsistent with the character of the neighborhood, would not be in harmony with the general purpose and intent of the residential zoning in this neighborhood and would adversely affect neighboring properties, nor has St. Patrick's met its burden of proof. The Applicant should find a more appropriate setting for its higher grades. Accordingly, we respectfully ask the BZA to deny this application.

Respectfully submitted,

Alma H. Gates 4/9/02

Alma H. Gates

K. Van Sickle 4/9/02

K. Van Sickle

Nancy L. Feldman 4/9/02

Nancy L. Feldman

INDEX TO TABS

A. Petition of 33 Neighbors Living Within 200 Feet of 4925 MacArthur Boulevard

B. Curriculum Vitae of Jawahar Mehra, P.E.

C. Chart Showing Use of 4925 MacArthur Property Under 1963 BZA Order Compared with St. Patrick's Proposal

D. Map Showing Signatories of Petition

E. Petition of Neighbors Living Outside 200 Feet of 4925 MacArthur Boulevard

F. 1999 Remarks to Board of Zoning Adjustment by Peter Barrett (Case 16517)

G. Daily Traffic Counts During A.M. Peak. Hour on MacArthur Boulevard

H. D.C. Municipal Regulation 18 Regarding School Buses

I. Chart Showing Ten Year Increase in Traffic and Parking Needs at St. Patrick's
Traffic Plan Fact Sheet

J. St. Patrick's Proposed Dismissal Car Pool Program: Summary, 4/3/02
Marty Wells Traffic Analysis Excerpt on Parental Cooperation of Current Traffic Plan

K. Letter from The George Washington University at Mt. Vernon College Outlining Proposed Shuttle Bus Schedule

L. Buffers

M. Photos

N. The View from Next Door

O. Privacy

P. Ashby Street Parking

Q. Designation of Fire Lanes

R. Whitehaven Parkway Parking

S. Visualization of Daily Population Impact Upon the Palisades Residential Neighborhood

T. Covenants

PETITION TO THE BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16852 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

We, the undersigned, neighbors of the premises at 4925 MacArthur Boulevard, NW, strongly oppose granting St. Patrick's Episcopal Day School a "special exception" from the existing low-density (R-1) residential zoning for a private junior high school. The proposed use would significantly intrude on the quiet residential character of narrow Ashby Street and the surrounding neighborhood, and create serious problems regarding noise, traffic, number of students, safety and parking. Furthermore, the property, which is less than half an acre in total, would not support any athletics or other normal outdoor school activities, necessitating the over-use of community resources. And finally, a favorable response to this petition would be in derogation of the zoning ground rules applicable to residential use and the expectations of the surrounding homeowners, would lower affected property values, and would encourage others to acquire small residential parcels in our neighborhood for unauthorized activities on the expectation that they could effect a conversion at a cheaper total price than buying properly zoned premises, as the applicant has admitted is the case here. For these reasons and other conditions, all of which will be described in detail by the opponents at the BZA hearing, we advise you that the proposed use is objectionable to adjoining and nearby property, and ask you to reject the subject application.

(name) DOROTHY E. O'DONNELL
by: Martin J. McNamara, Attorney in Fact

(address) 9720 Byeforde Road, Kensington, MD 20895

(name) DOROTHY E. O'DONNELL

(address) 4900 ASHBY STREET NW
WASHINGTON, D. C. 20007

(continued)

PETITION TO THE BOARD OF ZONING ADJUSTMENT, page 2

APPLICATION NO. 16852 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Nancy L Dellman 3/3/02
(address) 4911 "W" Street, N.W.
Wash, D.C. 20007

(name) Michael Lovendusky 3/10/02
(address) 4927 MacArthur Blvd NW
Washington DC 20007

(name) CATHY WRIGHT & ~~LAWRENCE SKRIVSETH~~ Cathy Wright
(address) 4913 MACARTHUR BLVD, NW
WASHINGTON DC 20007

(name) HOWARD FENTON
(address) 4915 ASHBY ST, NW
WASHINGTON DC 20007

(name) LAWRENCE T. SKRIVSETH
(address) 4913 MacArthur Blvd NW
Washington DC 20007

(name) Katherine Von Seckle DeMalle
(address) 4923 Ashby Street NW
Washington D.C. 20007

(name) SHARON A. HOUY
(address) 4922 Ashby St. N W.
Washington DC 20007

PETITION TO THE BOARD OF ZONING ADJUSTMENT, page 3

APPLICATION NO. 16852 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Campbell DeMallie, Jr. Campbell DeMallie Jr.
(address) 4923 Ashby Street, NW
Washington, DC 20007

(name) Douglas S. Ormerod -
(address) 4901 Ashby Str. NW
Washgt DC 20007

(name) Celma H. Gates
(address) 4911 Ashby St. NW
Washington DC 20007

(name) John N. Padella
(address) 2230-49th ST. NW
Washington DC 20007

(name) HARRY F. GATES Harry F Gates
(address) 4911 ASHBY ST. N.W.
WASHINGTON, D.C. 20007

(name) ANA R. ORMEROD Ana R. Ormerod
(address) 4901 ASHBY St., N.W.
WASHINGTON, DC 20007-1046

(name) ~~NENITA L. HERNANDEZ~~ Nenita L. Hernandez
(address) ~~4900 ASHBY ST. NW~~
~~Wash. D.C. 20007~~ other sheet

PETITION TO THE BOARD OF ZONING ADJUSTMENT, page 4

APPLICATION NO. 16852 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Charles J Hoey Jr

(address) 4922 Ashby st NW.
WASHINGTON, DC 20007

(name) Tom CARROLL

(address) 4918 ASHBY CT NW
WASHINGTON DC 20007

(name) DIANE T. HARDT

(address) 4918 Ashby St N.W.
WASH. D.C. 20007

(name) MELEVA LOVENDUSKY

(address) 4927 MacARTHUR Blvd. N.W.
WASH., D.C. 20007

(name) ERIC HILTON

(address) 4905 MacARTHUR BLVD NW
WASH, DC 20007

(name) Irene Claudio

(address) 4905 MacArthur Blvd NW
Washington, DC 20007

(name) Robert Ecu

(address) 4940 Ashby, NW
Washington, DC 20007

PETITION TO THE BOARD OF ZONING ADJUSTMENT, page 5

APPLICATION NO. 16852 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Ann Gibbons
(address) 4905 W St. N.W.
Washington D.C. 20007-1521
ANN GIBBONS

(name) Ronald A. Soffer
(address) 4916 MacArthur Blvd. N.W
Washington DC 20007-1047
RONALD E. SOFFER

(name) Theodore C. Mumil
(address) 4929 MACARTHUR BLVD.
WASH. D C 20007

(name) Virginia V. Brown
(address) 4929 MacArthur Blvd N W
Washington, D C 20007

(name) _____
(address) _____
_____

(name) _____
(address) _____
_____

(name) _____
(address) _____
_____

PETITION TO THE BOARD OF ZONING ADJUSTMENT, page 6

APPLICATION NO. 16852 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Mrs. Blythe (Maxwell Gray Blythe
(address) 4954 Ashby St. NW
Washington, D.C. 20007

(name) Flora B. Harper
(address) ~~4903 Q Street NW~~
Washington DC 20007

(name) Flora B Harper
(address) 4903 Potomac Ave NW
Washington DC 20007

(name) PAMELA SQUIRES/CIPRIAN
(address) 4914 MACARTHUR BLVD NW WDC20007
Pcard for ICA

(name) KAY E. ROGERS Kay E. Rogers
(address) 2220 49th ST. N.W.
WASHINGTON DC 20007

(name) Helen [illegible]
(address) [illegible]

(name) WINSTON J. YEE / JANICE WICKHAM
(address) 4948 ASHBY STR.
WASH. D.C. 20007

PETITION TO THE BOARD OF ZONING ADJUSTMENT, page 7

APPLICATION NO. 16852 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Robert Wittar Jr
(address) 809 MacArthur Blvd NW
DC 20007

(name) Nora E Cerini
(address) 4915 Ashby St. NW
Washington, D.C. 20007

(name) Polly Greenberg
(address) 4914 Ashby St, NW
Washington DC 20007

(name) Susan Lockwood
(address) 4901 MacArthur Blvd
Wash DC 20007

(name) Eric Robinson
(address) 4915 W Str. N.W.
WASHING DC. 20007.

(name) Z. [illegible]
(address) 4915 W Str. N.W.
WASH., D.C. 20007.

(name) Terry Abernathy
(address) 4907 W ST. N.W.
Wash. D.C. 20007

PETITION TO THE BOARD OF ZONING ADJUSTMENT, page 8

APPLICATION NO. 16852 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

We, the undersigned, neighbors of the premises at 4925 MacArthur Boulevard, NW, strongly oppose granting St. Patrick's Episcopal Day School a "special exception" from the existing low-density (R-1) residential zoning for a private junior high school. The proposed use would significantly intrude on the quiet residential character of narrow Ashby Street and the surrounding neighborhood, and create serious problems regarding noise, traffic, number of students, safety and parking. Furthermore, the property, which is less than half an acre in total, would not support any athletics or other normal outdoor school activities, necessitating the over-use of community resources. And finally, a favorable response to this application would be in derogation of the zoning ground rules applicable to residential use and the expectations of the surrounding homeowners, would lower affected property values, and would encourage others to acquire small residential parcels in our neighborhood for unauthorized activities on the expectation that they could effect a conversion at a cheaper total price than buying properly zoned premises, as the applicant has admitted is the case here. For these reasons and other conditions, all of which will be described in detail by the opponents at the BZA hearing, we advise you that the proposed use is overwhelmingly objectionable to adjoining and nearby property, and ask you to reject the subject application.

(name) Mike Italiano
(address) 4919 Ashby St., NW
Washington DC 20007

(name) Reva J. Hamilton
(address) 4919 Ashby St. NW
Washington D.C. 20007

We further oppose the school because the District prohibits on street parking (~~continued~~) adjacent to scha
entrances for student safety. Since we have no drive
way I live immediately adjacent to what would be the
school entrance, we would be forced at great expense to buil

JAWAHAR (JOE) MEHRA, P.E.

President, MCV Associates, Inc.

Education

- State University of New York, Buffalo, M.S. Industrial Engineering/Operations Research, 1972
- Indian Institute of Technology, Bombay, India, B.S. Mechanical Engineering, 1969

Previous Positions

- Callow Associates, Inc., Principal, 1988 - 1990
- Kellerco, Inc., Vice President, 1982 - 1988
- BKI Associates, Inc., Senior Transportation Engineer, 1978 - 1982
- Alan M. Voorhees and Associates, Associate Engineer, 1970 - 1978

Experience

He has over twenty five years experience in the areas of traffic engineering and transportation planning. He has managed several traffic engineering/operations studies in Maryland including traffic analysis, traffic signal design, pavement markings and signage. He has extensive experience with SHA standards and procedures having participated in several SHA contracts and related studies.

- **Traffic Analysis**. He has managed several traffic engineering studies in Maryland using SHA approved procedures including the Georgetown Branch Transitway MIS/DEIS for MTA (traffic forecasts, traffic impact, capacity/levels of service, queue jumper analysis) , the Route 28 Corridor in Montgomery County (existing conditions, traffic forecasts, capacity/levels of service, geometric improvements, conceptual plans), Post Office Road Study in Charles County, MD (data collection, capacity/levels of service, traffic forecasts, signal design, pavement marking, signing), Suitland Parkway Study (Prince George's County MD), etc. He has conducted numerous traffic impact studies in Maryland using SHA format. All these studies were reviewed and approved by SHA. Some of these studies include the Villages of Piscataway Study (1000 acres), The Clinton/Townshend Property (800 acres), Expansion of Clinton Plaza, The Shady grove Life Sciences Center Traffic Study, The Heards estates Traffic Study in St. Mary's County, College Park TDOZ, Waters Landing Corporate Park in Germantown, Milestone Property in Germantown, MD, etc. He is the Project Manager on two traffic engineering retainers – with Montgomery County and Prince George's County. These studies include traffic analysis, signal design, data collection, capacity/levels of service, TCPs, etc. Other traffic engineering studies that he has managed include the Route 58 Traffic Engineering Study, Route 123 Corridor study in Fairfax City, TOPICS study for Buffalo, New York; TSM study for East End of Pittsburgh, Pennsylvania; etc.
- **Traffic Signal Design/Operations**. Most of the studies related to traffic signal design were prepared using SHA standards and specifications and include Middlebrook Road, Post Office Road and currently preparing as-built signal plans for twenty intersections in Montgomery County using SHA standards. He has managed the Route 30 corridor study that included the TRANSYT-7F analysis for the signal system study and timing development for 11 signals and the NETSIM analysis for the Springfield Mall subarea to conduct queuing and timing analysis.
- **Traffic Control Plans**. He has managed the preparation of traffic control plans for 46th Avenue Reconstruction in the Town of Edmonston (MD), TCP for Boyds Road in Calvert County, etc. using SHA standards.
- **Traffic Data Collection/Analysis**. He has managed six contracts to conduct various types of traffic data collection activities for SHA. Mr. Mehra is the Project Manager for SHA Contract BCS 97-02 to conduct portable machine counts for Maryland.

Professional Affiliations

- Fellow, Institute of Transportation Engineers, Chairman, ITE Technical Council Committee 6A35, "Use of Transportation Planning Models to Monitor and Review Growth Impacts"; Member TRB

USE OF 4925 MACARTHUR PROPERTY UNDER 1963 BZA ORDER COMPARED WITH ST. PATRICK'S PROPOSAL

Current Owner Under Special Exception***		St. Patrick's Proposal**	
Daily M-F Morning	Arrival of 3-5 Administrative Staff and Visitors	7:30-8:00	12 faculty and 60 children aged 12-14 arrive
	During the day medical research library is available for limited use.	Hours TBD	Students walk through neighborhood to 4880A MacArthur and back from Science Lab-shuttle busses in bad weather. Special events and lectures at Whitehaven Friday transit to chapel
Lunch		11:15-12:45	Lunch Break - Students Outside on Property playing Frisbee, basketball, catch, etc. Unfenced and unbuffered perimeter of property is 10 feet from MacArthur and nearby houses are 3-11 feet from proposed schoolyard. (Noise and safety issues)
		TBD	Study "Breaks" - 30-60 students outside on property
		3:00-4:00	School athletics through neighborhood at Battery Kemble Park, Yates and Whitehaven
Afternoon	Departure of staff and visitors	TBD	School Closing, Pickup of Students and departure of faculty
Evenings	2 classes per month with less than 10 students, 2 faculty and executive council meetings per month. Occasional committee meetings.	Evenings	Janitorial
Saturdays	Up to 60 adult resident physicians, 8:00AM -12:30PM	Saturdays	To be determined
Sundays	Not used	Sundays	To be determined
Summer	No Summer School	Summer	Possible Summer School
Classroom Hours per Month	30 Hours	Classroom Hours per Month	154 Hours

OTHER ASPECTS OF PROPERTY

Physical Layout of Property	20,000 sq. ft. including approximately 6,700 sq. ft parking lot, several trees, 4000-5000 sq. ft. green space and house	Physical Layout of Property	Physical layout may be reconfigured with life safety addition (stairwell), science lab and double stacking of porch.
Ashby Street	No loss of parking on street *Traffic about 75-103 cars 7:30-8:30 am	Ashby Street	Potential loss of 5-6 parking spaces - TBD Traffic pattern - Optional loop through Palisades

*Count taken on three days during peak period time identified by DC Traffic Department - 7:30-8:30 am

**Taken from data in 1/22/2002 package.

Note: TBD = To be determined

*****BZA GRANTED SPECIAL EXCEPTION IN 1963 DUE TO LIMITED USE OF THE PREMISES AND THE FACT THAT "IN GENERAL THE ACTIVITIES OF THIS MEDICAL ORGANIZATION ARE EXTREMELY QUIET AND LESS THAN THAT WHICH WOULD OCCUR IN MANY PRIVATE HOMES." (BZA ORDER 7360)**

The Institute and St. Patrick's Junior High School
Comparative Monthly Classroom Use

Summary

The Institute --- 27 or 31 ½ hours per month

St. Patrick's --- 154 or 161 hours per month

Conclusion: St. Patrick's proposed use would be 5 times greater than The Institute's current use.

Calculations

1. The Institute
   - A. Classroom days used during the month:
     1. Saturday Mornings
     2. Two Wednesday evenings per month
   - B. Hours of classroom use:
     1. Saturdays – 4.1/2 hours (8AM-12:30PM)
     2. Wednesdays – None stated – Assume same as Saturdays, e.g. 4 ½ hours
   - C. Monthly Class Hours
     1. Saturdays – 18 or 22.5 hours depending on number Of Saturdays in the month, e.g. 4 or 5
     2. Wednesdays – 9 hours per month
   - D. Total Institute monthly classroom hours – 27 or 31.1/2 depending on number of Saturdays in the month.

2. St. Patrick's Junior High School
   - A. Days used during the month --- 22 or 23, depending on number of total days in the month (February excluded).
   - B. Hours of classroom use on a daily basis – 7
   - C. Total monthly class hours – 154 or 161 depend on number of classroom days in the particular month.

Sources:

1. The Institute – BZA Appeal # 7360, dated July 10, 1963.
2. St. Patrick's – "Defining Our Program for Grades 7 & 8 at 4925 MacArthur Boulevard", Jan.22, 2002

Date: Apr. 2, 2002

DS Ormerod

PETITION LEGEND

- Owner occupied residence within 200 feet of 4925 MacArthur Boulevard
- Renter occupied residence within 200 feet of 4925 MacArthur Boulevard
- Owner occupied residence within 200 feet of 4925 MacArthur Boulevard remaining neutral
- Occupants living outside of 200 feet of 4925 MacArthur Boulevard



PETITION TO THE BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Dina Economides
(address) 4825 Dexter Ter.
WDC 20007.

(name) Pat MacLeury
(address) 4743 Berkley Tr.
20007

(name) Rita McKinney
(address) 4838 W Street
Washington DC 20007

(name) Francisco Economides
(address) 4825 Dexter Ter NW
Wash. DC 20007.

(name) Valerie Lebensohn
(address) 4822 Reservoir Rd NW #2
Washington DC 2007

(name) Nancy Lebensohn
(address) 4840 Hutchins Pl. N.W.
Washington D.C. 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) RYAN MAHER

(address) 4888 MacArthur Blvd NW #1
WASHington, DC 20007

(name) Martha Ramsey

(address) 4966 MacArthur Blvd NW
Washington, DC 20007

(name) Sarah Kelly Campbell

(address) 4641 Greene Place N.W.
Washington DC 20007

(name) Dorothy Samuelson

(address) 5304 Dorsett Pl. NW
Washington DC 20016

(name) Stanley C. Brind

(address) 4753 WHITEHAVEN PLACE
WASHINGTON, D.C. 20007

(name) FRANK ECONOMIDES

(address) 4825 DEXTER TERR. NW
WASHINGTON DC 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Rochael Everts

(address) 2351 49th St. N.W
Washington, D.C.

(name) ----------

(address) ----------

(name) ----------

(address) ----------

(name) ----------

(address) ----------

(name) ----------

(address) ----------

(name) ----------

(address) ----------

PETITION TO THE BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Mila Sauda

(address) 4895 MacArthur Blvd NW
Washington DC 20007

(name) Frank S Russo

(address) 4848 'O' ST NW
Georgetown DC 20007

(name) Anthony & Rita McKinney

(address) 4838 W ST NW
WASHINGTON DC 20007

(name) Vaughan W. Wilson

(address) 4806 HUTCHINS PL. N.W.
WASHington, D.C 20007

(name) Garrett Lowe

(address) 4812 Hutchins Place
Washington, DC 20007

(name) Cathleen Gibbons

(address) 4848 Hutchins Pl., NW
Washington, DC 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Ted Greenberg
(address) 4852 Hutchins Pl NW
WDC 20007

(name) Jim Haddad
(address) 4852 Hutchins Pl NW
WDC 20007

(name) Jonathan Alderson
(address) 4845 Hutchins Pl. NW
Washington DC 20007

(name) Zorah M. Alderson
(address) 4845 Hutchins Pl NW
Wash DC 20007

(name) Annie Love
(address) 4812 Hutchins Pl
Washington DC 20007

(name) Martin B. Bernstein
(address) 2216 King Place
Washington, D.C. 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Adrienne Edisis

(address) 2317 49th Street NW
Washington DC 20007

(name) mike stadtler

(address) 2343 49th ST, NW
WASH, DC 20007

(name) Jane Preisinger

(address) 2343 49th St., N.W.
Washington, DC 20007

(name) JAMES F. CARNEY

(address) 4828 W ST, NW
WASHINGTON, DC 20007

(name) Ellen S. Overton

(address) 4820 W Street NW
Washington DC 20007

(name) Jennifer A. Lowry / Jennifer Lowry

(address) 4895 MacArthur Blvd NW
Washington DC 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Marissa Rauch

(address) 4736 W ST NW
WDC 20007

(name) Sylvia R Shugrue

(address) 3207 Fairhall Pl NW
Wash DC 20007

(name) TIMOTHY SWEENEY

(address) 4929 MacARTHUR BLVD.
WASH. D.C.

(name) Carl Oliphant

(address) 4816 W St. N.W.
Washington D.C. 20007

(name) Charlotte Bingham Bossard

(address) 2331 49th Street
Washington, D.C.

(name) Wayne Ellis

(address) 3307 49th Street NW
Washington D.C. 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Mary L McCarthy
(address) 4813 W St. N.W.
Wash. D.C. 20007

(name) Raisa Senabre Wallace
(address) 4811 W Street NW
Washington DC 20007

(name) Mary W. Jury
(address) 2104 - 48th St NW
Washington, DC 20007

(name) James M Claudio
(address) 4905 MacArthur Blvd
Washington, DC 20007

(name) Richard H Slater
(address) 4813 V St. N.W.
Washington, D.C. 20007

(name) Dorothea L. Slater
(address) 4813 V St. N.W.
Washington, D.C. 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Martha M Sulgan

(address) 2318 King Pl. NW
Wash DC 20007

(name) [signature]

(address) 2318 King Pl, NW
Washington DC 20007

(name) Lois N. Howard

(address) 4834 W St. NW
Washington, DC 20007-1518

(name) Edward C. Purrington

(address) 4834 W St. NW
DC 20007-1518

(name) Reza Firuzabadi

(address) 4839 Hutchins Pl
DC 20007

(name) Carolyn Chadwick

(address) 4832 Hutchins Pl NW
Washington, DC 20007

PETITION TO THE BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) JAMES CUTTING

(address) 4835 CALVERT ST, DC 20007

James M. Cutting

(name) CAROLYN A. LUNDELL

(address) 4914 Ashby St. NW

Carolyn A Lundell

(name) Marie J. Crowe

(address) 2339 - 49th St. N.W.

Washington D.C. 20007

(name) Alex Chadwick

(address) 4832 Hubbard Pl., NW

Washington, D.C. 20007

(name) L. Knapp

(address) 2323 49th St NW

Wash. DC 20007

(name) Rick O Knapp

(address) 2323 49th St NW

Wash DC 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) JACQUELINE SENIOR

(address) 4889 MACARTHUR BLVD
WASHINGTON DC 20007

(name) Edgar J Jenkins

(address) 2361 King Pl. N.W.
Washington, DC. 2007

(name) Mary C. Jenkins

(address) 2361 King Pl. N.W
Washington DC. 2007

(name) June C. Bashkin

(address) 2358 King Pl NW
Washington DC 20007

(name) Barbara P. Vandegrift

(address) 2367 King Pl NW
Wash DC 20007

(name) Darrell A. Fearn

(address) 4849 W St NW
Wash, DC 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) David M Paul

(address) 4912 "W" St. N.W.
Washington DC 20007

(name) Margaret E Paul

(address) 4912 W Street N.W
Washington DC 20007

(name) LINA WAGA

(address) 4908 W Street, NW
Washington, DC 20007

(name) Jennifer Miller

(address) 4911 V St NW
Washington DC 20007

(name) Abbie Fosburgh

(address) 4887 MacArthur Blvd. NW
Washington DC 20007

(name) Jonathan Senior

(address) 4889 MacArthur Blvd. NW
Washington DC 20007

PETITION TO THE BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Mary Cutting

(address) 4825 Calvert ST NW
Washington DC 20007

(name) Ann H. Brown

(address) 4848 - Dexter St.
DC. 20007

(name) Travis Brown

(address) 4848 - Dexter St
DC 20007

(name) Stephanie Wallace

(address) 2215 49th St N.W.
DC 20007

(name) Gladys P. Kirchoff

(address) 2205 49TH ST. NW.
DC 20007

(name) Barry Swanson

(address) 2205 49TH ST. N.W.
DC 20007

Renter living within 200 feet of 4925 MacArthur Boulevard

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Hossein Kashani and Bambi Kashani

(address) 4931 MacArthur Blvd NW
Washington DC 20007

(name) Max W. Geen

(address) 2335 49th ST NW
Washington, DC 20007

(name) Debbie Singleton

(address) 4933 MacArthur BVd. NW
Washington, DC 20007

(name) Skip Singleton

(address) 4933 MacArthur BVd, NW
Washington, DC 20007

(name) Daniel Nassiter

(address) 2367 49 St.
Wash DC 20007

(name)

(address) 4837 W ST NW
WASH. DC

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Anne Masters

(address) 4898 MacArthur Blvd. NW

(name) Caroline C. Turkus

(address) 2235 49th St. N.W.

Caroline C. Turkus

(name) Marsha Simon

(address) 2248 49th St, NW

WDC 20007

(name) Kristen von Fiedel

(address) 2227 49th St. N.W.

Wash. D.C. 20007

(name) Anna F. von Fiedel

(address) 2227 49 st N.W.

WASH. D.E. 20007

(name) Adam Cornwell

(address) 2219 49th St NW

Washington, D.C. 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Albert H. Turkus (ALBERT H. TURKUS)

(address) 2235 49th St, NW
WASHINGTON, DC 20007

(name) Kathryn B. Taylor Kathryn B. Taylor

(address) 4960 MacArthur Blvd NW
Washington, DC 20007

(name) THOMAS + ANNA Z. BRADLEY

(address) 4742 "W" St, N.W.
WASH. DC 20007

(name) PAUL TENDLER Paul M Tendler

(address) 2327 KING PL N.W D.C.

(name) ELAINE TENDLER Elaine Tendler

(address) " "

(name) Tim Dodd

(address) 2345 King PL NW
Wash. D.C 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Kevin Stone

(address) 2347 49TH ST. NW
Washington, DC 20007

(name) Nancy N Stone

(address) 2347 49th St. NW
Washington DC 20007

(name) William F. Stone

(address) 2347 49th St, NW
Washington, DC 20007

(name) Carl J. Erts

(address) 4748 W St NW.
Wash DC 20007

(name) Stanley Morris ~~Nina Morris~~ Nina

(address) 4916 W STREET NW
Washington DC 20007

(name) Nina Morris

(address) 4916 W ST. NW
WASHINGTON DC 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Charles L. Bartlett

(address) 4615 W ST N.W.

20007

(name) Lauryn Fallon

(address) 4801 W St NW 20007

(name) John B Fallon

(address) 4821 W St NW 20007

(name) Brian R. Cook / Brian R. Cook

(address) 4800 W St. NW

Wash. DC 20007

(name) Elizabeth Conrad / Elizabeth Conrad

(address) 4800 W St. NW

Wash DC 20007

(name) Scott Fan

(address) 2243 49th St NW

Wash D.C. 20007

Renters living within 200 feet of 4925 MacArthur Boulevard

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) C. ARMSTRONG

(address) 2330 KING Place
N.W. DC.

(name) Whit Fosburgh

(address) 4887 MacArthur Blvd
NW DC 20007

(name) Rafael Dantu 4900 ASHBY ST

(address) Monica L. Hernandez 4900 Ashby St. NW Wash. D C. 20007

(name) Birgit Pall-Haupt

(address) 2224 49th Street N.W
Washington, DC 20007

(name) Felix Haupt

(address) 2224 49th St. N.W.
Washington, DC 20007

(name) April Gates

(address) 4911 Ashby Street, N.W.
Washington, DC 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) ATLAN. Robert and Jean Davis

(address) 2225 49th St. NW
Washington DC 20007

(name) Adam & Maria Emanuel

(address) 2219 49th St. NW
Washington DC 20007 Maria Emanuel

(name) Jean Smith

(address) 2325 49 Street NW
Washington, DC 20007

(name) Mollie Dodd

(address) 2345 King Pl. NW.
DC. 20007

(name) Hortence Hoole

(address) 2232-49th St. N.W. 2007

(name) Marian B. Bartlett

(address) 4615 W ST. N.W.
20007

PETITION TO THE BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) [signature]

(address) 2361 49th St, N.W.
Washington, D.C. 20007

(name) Isabelle O'Hearn

(address) 4830 Calvert St. N.W.
Washington, D.C. 20007

(name) [signature]

(address) 4830 CALVERT ST. N.W.
WASHINGTON, D.C. 20007

(name) Eugenia Romily

(address) 2246 49th St nw
Washington DC 20007

(name) George T. Romily

(address) 2246 49th St N W
Wash. D C 20007

(name) CAROL KNOUSE [signature]

(address) 2323 KING PLACE, NW.
WASHINGTON, D.C. 20007

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) CHRISTINE ALVAREZ

(address) 5023 V. ST NW 20007

Christine A. Alvarez

(name) Tom Ryan

(address) 5021 V St. NW 20007

(name) Max Alvarez

(address) 5023 V St. NW 20007

(name) Elizabeth W. BAER

(address) 2222 KING PLACE, NW

BAER

(name) Christopher Baer

(address) 2222 KING PLACE, NW

CBaer

(name)

(address)

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition ~~to the~~ Application

(name) S. Kafrouni

(address) 4808 V St NW
DC 20007

(name) Mr and Mrs Charles Hartley

(address) 4601 Ashby St NW.
Washington DC 20007

(name) ---

(address) ---

(name) ---

(address) ---

(name) ---

(address) ---

(name) ---

(address) ---

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Claire L. Farquhar

(address) 2240 47th St. N.W.
Washington D.C. 20007

(name) John Fallon

(address) ~~4807 W~~ ST.
Washington DC 20007

(name) James R. Rosen

(address) 4800 V Street, NW
Washington, DC 20007

(name) Emily C. Smith

(address) 2118 49th St N.W
Washington D.C. 20007

(name) Mary Jane Smith

(address) 2118 49th St N.W
Washington, D.C. 20007

(name)

(address)

BOARD OF ZONING ADJUSTMENT

APPLICATION NO. 16853 (ST. PATRICK'S EPISCOPAL DAY SCHOOL)

Neighbors in Opposition to the Application

(name) Z. M. Lebensohn
(address) 4840 Hutchins Pl NW
Washington DC. 20007

(name) David LaGesse
(address) 2015 48TH St NW
Washington DC 20007

(name) Lynn Cook
(address) 4812 Mac Arthur Blvd
Wash D.C 20007

(name) Vui Bui
(address) 5236 Sherier Pl NW
Wash. DC 20016

(name) Laura Kuyman
(address) 2100 - 48th Street, N.W.
Wash, DC 20007

(name) Gerald W. Fauquier
(address) 2240 47th St. NW
Wash. D.C. 20007

St. Patrick's
EPISCOPAL DAY SCHOOL

PETER A. BARRETT
Head of School

CASE 16517

Rec'd.
DEC - 8 1999

REMARKS TO BOARD OF ZONING ADJUSTMENT

BZA
Case No. 16517
Exhibit No. 27

8 December 1999

St. Patrick's Episcopal Day School, which was founded in 1956, has been located at 4700 Whitehaven Parkway, NW, for almost a quarter of a century. Across that time, St. Patrick's educational program for children in the three-year-old Nursery School through Grade 6 has changed along with changes in thinking about the kinds of instructional spaces children need, how to group them most effectively for instruction within those spaces, and the kinds of technologies that are available to enhance that instruction. The attractiveness of its program has also grown, so that St. Patrick's is now the school-home to more children than ever before and one of the premier independent elementary schools in the Washington area.

The constraints of our 25-year-old physical plant increasingly assert themselves, to the point now that we have had to re-think our configuration and use of space. In response, our community has developed a new Campus Master Plan centered around core facilities, shared across grade levels—such as school libraries, additional art spaces, and a gymnasium—that will enable us to meet the needs of our current student body more effectively. Please remember that the Campus Master Plan seeks no increase in the number of students who attend St. Patrick's and no change in the grade levels we offer. There are no additional academic classrooms planned; any new classrooms will replace existing instructional spaces that will be converted to other uses. No additional grade levels, no additional students, no additional teachers, no additional cars. Just a school that, with a creative mix of new construction and renovation of existing space, is better able to meet the needs of its current students; is architecturally

more attractive and more consistent with the design of St. Patrick's Church; and can offer faculty, staff, and visitors more than double the parking spaces that have been available to lessen its impact on Whitehaven Parkway.

St. Patrick's is committed to the education of young people in the District of Columbia and its immediate suburbs. Sixty-four per cent of St. Patrick's students—283 children—are residents of the District of Columbia. This elementary school has an impressive financial aid budget of more than $650,000 in the 1999-2000 school year to make it more accessible to families who would otherwise be unable to rely on it. Fifty-two per cent of the students who participate in the financial aid program are District residents.

The first phase of St. Patrick's Campus Master Plan is complete. This summer, St. Patrick's relocated its Nursery School playground to the area behind the Church and Day School building and, in the process, created a wonderful new space for the physical activity and play of our youngest students. The more public face of that first phase comprised the creation of 48 diagonal parking spaces for the St. Patrick's community in rented public space on the south side of Whitehaven Parkway, the installation of a sidewalk along that new parking area from near Foxhall Road to the Church and Day School property, and the re-grading and seeding of the former playground and Church Lawn on the east end of the building, which will remain green space. Completion of that first phase has taken people heading to the building on foot—faculty, parents, children, and visitors—out of the travel space on Whitehaven, a significant safety improvement. It has also enabled us to provide members of our community with considerably more parking during school and church hours that is similarly out of the Whitehaven travel space. The first-phase work has also reduced congestion along upper Whitehaven Parkway during our arrival and dismissal carpools, especially in the afternoon, when cars can move more safely around our waiting carpool line in either an east- or west-bound direction. We have transformed the ragged, cluttered southern edge of upper Whitehaven Parkway into a tidier, more attractive, and safer boundary for the street.

The second phase of our Campus Master Plan, for which we seek your approval today, will have a similarly ameliorative impact on Whitehaven Parkway and its immediate environs. In the conception, sizing, and design of the proposed 12,000-square-foot building expansion on the west end of the building and the proposed 12,000-square-foot gymnasium across Whitehaven Parkway adjacent to our playing field, we offer improvements that are fully consistent in scale with the existing building and its surroundings and, for those of you who find the existing school building all too boxy next to the beautiful church, even more attractive.

This second phase includes new Nursery School and Elementary School libraries to replace woefully undersized spaces, two new science labs to replace current labs that will be displaced when we move administrative offices closer to the school's redesigned front entrance, a new early childhood physical development space for Nursery and Kindergarten children in part of the space vacated by our current gymnasium, and a dining area so that children need not eat their lunches at their desks. A good example of the impact of the Master Plan are the redesigned art facilities. The school schedule currently moves approximately 300 children through a single art room twice a week, creating a significant bottleneck that affects instructional time in all subject areas at virtually all grade levels. The Master Plan calls for two separate art classrooms, a separate kiln room, and an adjacent gallery space to display our children's work. This is what I mean by meeting the needs of our current student body more effectively, as new core, shared facilities such as the art rooms enable us to adjust the time, space, and child relationships that currently exist.

We respectfully request that the Board of Zoning Adjustment grant our request for a special exception for our Campus Master Plan. Thank you.



Peter A. Barrett

4700 Whitehaven Parkway, NW ✣ Washington, DC 20007 ✣ 202-342-2804 ✣ 202-342-7001 (fax)

Traffic Flow on MacArthur Blvd-Block between Ashby and W Streets, April 2, 2002, 7:00-7:59 a.m.

ALS = Autos, light trucks, SUVs
VPM = Vehicles per minute

	Northbound					Southbound					Both Grand	
Time range	ALS	Bus	Truck	Total	VPM	ALS	Bus	Truck	Total	VPM	total	VPM
0700-0704	40	0	0	40	8	27	0	1	28	5.6	68	13.6
0705-0709	45	1	2	48	9.6	49	1	2	52	10.4	100	20
0710-0714	40	0	0	40	8	55	0	0	55	11	95	19
0715-0719	46	2	0	48	9.6	38	1	0	39	7.8	87	17.4
0720-0724	37	0	2	39	7.8	55	0	0	55	11	94	18.8
0725-0729	48	0	1	49	9.8	72	1	1	74	14.8	123	24.6
0730-0734	54	2	0	56	11.2	51	0	0	51	10.2	107	21.4
0735-0739	56	0	0	56	11.2	70	3	0	73	14.6	129	25.8
0740-0744	55	2	1	58	11.6	71	0	0	71	14.2	129	25.8
0745-0749	48	1	2	51	10.2	90	4	1	95	19	146	29.2
0750-0754	55	1	1	57	11.4	67	2	2	71	14.2	128	25.6
0755-0759	85	3	1	89	17.8	60	2	0	62	12.4	151	30.2
Totals												
0700-0759	609	12	10	631	10.52	705	14	7	726	145.2	1357	22.62
0700-0729	256	3	5	264	8.80	296	3	4	303	10.10	567	18.90
0730-0759	353	9	5	367	12.23	409	11	3	423	14.10	790	26.33

Traffic Flow on MacArthur Blvd-Block between Ashby and W Streets, April9, 2002, 7:00-7:59 a.m.

ALS = Autos, light trucks, SUVs
VPM = Vehicles per minute
M=Metrobus
S=School bus

	Northbound						Southbound						Both Grand	VPM
Time range	ALS	M bus	S bus	Truck	Total	VPM	ALS	M bus	S bus	Truck	Total	VPM	total	
0700-0704	23	0	1	0	24	4.8	33	0	0	0	33	6.6	57	11.4
0705-0709	30	0	1	3	34	6.8	42	1	0	1	44	8.8	78	15.6
0710-0714	24	0	0	1	25	5	59	0	0	0	59	11.8	84	16.8
0715-0719	42	2	0	1	45	9	65	0	0	0	65	13	110	22
0720-0724	52	0	1	2	55	11	67	1	0	1	69	13.8	124	24.8
0725-0729	42	0	0	4	46	9.2	75	1	0	2	78	15.6	124	24.8
0730-0734	36	0	1	2	39	7.8	85	2	0	1	88	17.6	127	25.4
0735-0739	48	2	0	0	50	10	74	0	2	1	77	15.4	127	25.4
0740-0744	66	0	1	1	68	13.6	91	0	0	4	95	19	163	32.6
0745-0749	37	0	1	0	38	7.6	122	1	1	1	125	25	163	32.6
0750-0754	88	1	2	0	91	18.2	93	1	3	1	98	19.6	189	37.8
0755-0759	106	0	0	1	107	21.4	121	0	3	2	126	25.2	233	46.6
Totals														
0700-0759	594	5	8	15	622	10.37	927	7	9	14	957	191.4	1579	26.32
0700-0729	213	2	3	11	229	7.63	341	3	0	4	348	11.60	577	19.23
0730-0759	381	3	5	4	393	13.10	586	4	9	10	609	20.30	1002	33.40