TESTIMONY OF ALMA H. GATES BEFORE THE BOARD OF ZONING ADJUSTMENT
IN OPPOSITION TO ST. PATRICK'S SCHOOL APPLICATION
OCTOBER 8, 2002

Chairman Griffis, members of the Board, good afternoon. My name is Alma Gates, representing the neighbors opposed to the application of St. Patrick's to place a private school in the midst of our residential neighborhood.

The Palisades community remembers that as far back as 1983, St. Patrick's has been claiming to solve its self-generated traffic problems. Foxhall Village twice said no to the school's plans for expansion because traffic related to the school was seriously impacting that neighborhood. When denied, they moved over to Whitehaven Parkway and constructed a new facility. Their 1983 application to the BZA gave the following description, " There is no problem with parking vehicles on both sides of Whitehaven Parkway because the street is a very low-volume street. There are no problems in terms of traffic engineering, traffic operations and safety." This representation by St. Patrick's proved to be incredible. The traffic and congestion the school had generated in Foxhall Village was recreated and worsened on Whitehaven Parkway.

In 1990, the school returned to the BZA to increase its student population from 390 to 440 and its faculty and staff from 51 to 60, the caps under which the school is currently operating. Robert Ross Peterson, Mr. Barrett's predecessor, informed the BZA at that time, "Our school has always been aware of the need to control the number of vehicles that flow in and out of the site each day in the morning and the evening. We have made deliberate efforts to encourage car pooling...We have established staggered pick-up times and arrival times." Again, all of these representations proved to be incredible. Robert L. Morris, hired to conduct the school's traffic survey, noted that St. Patrick's had an average vehicle occupancy rate of 3.2 and both the intersections at MacArthur and Whitehaven and Foxhall and Whitehaven were functioning at a level of service, A. Level of Service is the measure used by the District Department of Transportation to determine driver delay at an intersection, with A being very little or no delay and F being inadequate or long delay.

In December of 1999, the school returned to the BZA to request permission to build a gymnasium and expand its classroom space. In his remarks, headmaster Peter Barrett testified, "Please remember 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...No additional grade levels, no additional students, no additional teachers, no additional cars." He continued, "the first-phase work has also reduced congestion along upper Whitehaven Parkway during our arrival and dismissal car pools, especially in the afternoon, when cars can move more safely around our waiting car pool 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." These representations have proven to be incredible.

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In late 2001, the school informed the Palisades community it was expanding, although it had pledged not to do so when it wanted support for a new gymnasium and classroom addition a year and a half earlier. The extra traffic resulting from the addition of 50 students over a six year phase-in period beginning in 1990 and the additional staff members, which now number between 80 and 100, has had significant impact. The level of service has dropped to a C on eastbound Whitehaven Parkway and to an F on westbound Whitehaven. The parking that the traffic expert said was no problem in 1983 has become such a problem that DDOT has required its removal to install a third through lane in an attempt to improve the flow of traffic. Average vehicle occupancy is currently at 1.3 and the number of cars transporting students has tripled in 10 years. Once again, the school has made assurances they will get the traffic under control. Simultaneously, the school maintains that previous car pool plans failed because of seat belt laws and the many different locations of the students, but that now, although those conditions persist, car pooling can succeed.

You are now going to see a video , taped on September 4th and 23rd of this year which we would like to enter into evidence in this case. The video first displays the site of the proposed special exception at 4925 MacArthur, illustrating how narrow the intersecting Ashby Street is to any traffic arriving or departing from the proposed school. You will also see how compact and completely residential the neighborhood is. The video then moves to St. Patrick's on Whitehaven Parkway, where the school proposes to add shuttle buses to ferry the middle school students to and from the MacArthur site. The Whitehaven footage displays two typical days of traffic. As you will see, the traffic there is typically congested and confused, with parents ignoring traffic signs, traffic laws, DDOT plans and St. Patrick's rules and guidance.

I submit this testimony today as a private citizen. I am also, however, Traffic Chair of the Palisades Citizens Association, a member of the Ward 3 Transportation Task Force, as well as a member of the Mayor's Task Force on Parking, I deal with traffic on a daily basis. I speak from experience. I have lived within the Palisades my entire life and have witnessed the changes on Whitehaven Parkway over the past 25 years. School-related traffic is a major problem. Keeping the number of cars at current levels is not an acceptable solution. Running school buses through the community far outside school boundaries is not a solution. Removing un-zoned public parking is not a solution. Parents have been encouraged to car pool since 1983, but average vehicle occupancy has gone from 3.2 to 1.32. Maintaining the status quo by raising the average vehicle occupancy to 1.6 is not an ambitious solution. It is not a solution to foist upon the neighborhood an untested and incomplete car pool plan. St. Patrick's "amended" car pool plan doesn't even cover the morning drop-off periods, which would only be attempted a year or so later. St. Patrick's amended plan includes a trivial financial penalty and afternoon pick-up times that may actually be counter-productive to traffic reduction or stabilization. The 3:00 p.m. dismissal process lasts for almost 40 minutes and is currently affecting Whitehaven Parkway, Foxhall Road, W Street, MacArthur Boulevard and the V Street cul de sac below Reservoir Road where jr. high parents drop off and wait to pick up students on afternoons when there are no after school activities. Spreading traffic throughout the community is not a solution. Spreading traffic over a six hour afternoon period four days a week is not a solution. The community no longer believes the school can improve its traffic impact, and we have good reasons

for our beliefs. The community no longer believes DDOT when it says it has every reason to believe the school will improve its traffic record. Neither do we believe the Office of Planning when it tries to force fit a school for 60 junior high school students into a house on MacArthur Boulevard; and, where by the way, almost 10,000 speeding tickets were issued this summer during the months of July and August. (9871. Patrick Burke, Traffic Officer MPD) Placing additional burden and responsibility on the community through more required meetings and monitoring is not a solution. St. Patrick's families, spread over 23 zip codes, will not change their commuting patterns.

The proposed DDOT solution is the community liaison program. This is not a new concept. Community liaison gatherings take place all over the city. In the Palisades I currently attend such meetings at GW/Mt. Vernon, Rock Creek International School and Field School, and my experience is that they result only in chat sessions, with the schools being very defensive and making excuses for their non-compliance, and then, only if they actually get caught. DDOT itself has not begun the four month test it promised the BZA would start in early July, nor has it done the significant road reconfiguration it contemplated for this project.

DDOT evidently expects ANC 3D and neighbors to monitor and verify the traffic patterns and traffic counts at St. Patrick's, but we don't want this full-time responsibility. Further, it is unfair and even silly for DDOT to propose that teachers and school bus drivers would ensure accurate, unbiased traffic counts to be taken in addition to their other assigned traffic-related duties using the proposed brief reporting form DDOT provided to us May 10th. The simplistic DDOT yearly check-off form with yes/no answers is not an adequate or effective reporting tool. The new Compliance Officer, Toye Bello, charged with overseeing literally hundreds of BZA Orders, would review the yes/no answers at the end of the year and place the form in a file. This process cannot taken seriously. To take it seriously is unreasonable and contrary to common sense. The burden for attending, counting, monitoring, reporting and filing complaints is on the community, but it should not be imposed on the community.

St. Patrick's is asking the neighbors to make another leap of faith and allow the establishment of their junior high school on MacArthur Boulevard at Ashby Street. They pledge they will MAKE it work this time in spite of an abysmal history in Foxhall Village and on Whitehaven Parkway. They pledge they will make it work this time in spite of past failed car pool plans and a failed van service. But, history has taught St. Patrick's a fresh start and the construction of a new school on Whitehaven in 1983 could not make it work. The addition of a parking lot and a gymnasium could not make it work. An army of teachers and the headmaster directing traffic could not make it work. The neighborhood is unwilling to take on faith that a new unproven car pool plan would make it work, and it would be unfair and contrary to common sense for the BZA to expect it of us. The school has spread its traffic volume across Whitehaven, Foxhall, W Street, V Street and beyond, and now wants to extend congestion even further by moving down to Ashby Street via Arizona, Loughboro and Foxhall Road. We have good reason to believe that, over time, the approval of this proposal would result in the Ashby, MacArthur and W Street corridor going the way of Whitehaven. Inevitably, St. Patrick's buses would find the overly long route a burden and use neighborhood streets just as parents will

drop off students in the MacArthur/ Ashby Street area rather than face the queue on Whitehaven.

We appeal to the BZA to preserve the stability, character and residential fabric of our neighborhood. We appeal to the BZA to recognize that the school can find an appropriate site for its Jr. High School where there are facilities that support the needs of its adolescent students without impacting nearby neighbors or necessitating the over use of community resources. We appeal to the BZA to respect the 203 petitioners who oppose the establishment of a jr. high school at the corner of MacArthur Boulevard and Ashby Street because such a proposed intense use is overwhelmingly objectionable.