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November 8, 2002

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D.C. OFFICE OF ZONING
2002 NOV -8 PM 4:41

Mr. Geoffrey Griffis
Chairman
Board of Zoning Adjustment
441 4th Street, Suite 210
Washington, DC 20001

Re: St. Patrick's School -- 4925 MacArthur Boulevard, N.W.
BZA Case No. 16852

Dear Chairman Griffis and Members of the Board:

In response to items requested at the October 8, 2002, hearing for this case, we enclose one original and twenty copies of the following:

1. A copy of Katherine Bradley's closing statement which she was required to abbreviate at the hearing;

2. A site plan comparing the current parking area with the proposed parking area;

3. A synopsis of the planned outdoor activity time for the students; and

4. A requested submission from the Applicant's traffic engineer, Wells & Associates.

If you have any questions, please do not hesitate to contact us.

Sincerely,

Allison C. Prince

Allison C. Prince

Enclosures

Document #: 1285805 v.1

BZA
Case No. 16852
Exhibit No. 340

Board of Zoning Adjustment
District of Columbia
CASE NO.16852
EXHIBIT NO.340

Certificate of Service

I hereby certify that on November 8, 2002, a copy of the foregoing letter and attachments was delivered by hand-delivery and/or regular mail to the following:

John Finney
ANC 3D04
5275 Watson Street, N.W.
Washington, D.C. 20016

Nancy Feldman
4911 "W" Street, N.W.
Washington, D.C. 20007

Alma Gates
4911 Ashby Street, N.W.
Washington, D.C. 20007

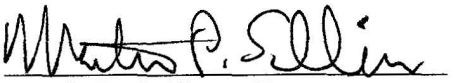
Katherine Van Sickle DeMallie
4923 Ashby Street, N.W.
Washington, D.C. 20007

Lawrence Skrivseth and Cathy Wright
4913 MacArthur Blvd., N.W.
Washington D.C. 20007

Michael Lovendusky
4927 MacArthur Blvd., N.W.
Washington, D.C. 20007

Ken Laden and Rachel MacCleery
DDOT
2000 14th Street, N.W., 7th Floor
Washington, D.C. 20009

Maxine Brown Roberts
Office of Planning
801 N. Capitol Street, N.E., 4th Floor
Washington, D.C. 20002



Martin P. Sullivan, Esq.
Shaw Pittman LLP

Document #: 1246672 v.2

CLOSING TESTIMONY OF KATHERINE BRADLEY

CLOSING STATEMENT

Good evening. We've all been here for a long time so I am going to be brief. There are a few basic, reasonable facts to remember. I'll go over them quickly, so we can all get home.

But first, let me be honest: No one would identify as their first choice that a school move in next door. That's a simple fact of life. Any resident would prefer the lowest intensity use possible for a property near their home. You heard about the petition circulated against St. Patrick's, that mentioned traffic congestion and parking problems and future expansion to other properties. Who wouldn't have signed that? You don't *ask* for a school any more than you ask for a teenage boy who plays a lot of basketball to please move in.

But that's not the way things work in a city. We don't get to choose who moves in. We have standards of fairness that we all abide by and when we disagree, we have impartial judges to sort things out. It may not be our first choice, but if it's fair use of the land, and a school moves in, most of us accept that some facets of city life—like schools—do come with minor inconveniences. But they also bring great blessings for the common good. That's really what this comes down to: What minor impacts are accceptable in a city, on a busy thoroughfare, in order to allow the creation of something obviously designed to be a blessing to children and families of our neighborhood and throughout our metropolitan area.

This summer, across the street from my home, a school leased a former embassy property for a program with several hundred children, so I understand, better than I did before, what it feels like to be the neighbor in this dispute. Will there be impacts to manage? Of course. But

having worked on this case on MacArthur Boulevard, I am convinced that there are good solutions to every impact a school has, solutions that we can get to without much problem if we agree to work constructively together. In order to get there, though, you have to first accept that schools are expected to be located in residential zones. Without that basic shared understanding—absent from much of this debate—the shared community conversation doesn't get anywhere fast. Let me move to five basic points about this case.

So, Point #1: Schools are expected to be in residential zones.

The code makes that clear, and it is the practice all over this great city of ours. In this case, a school has operated at 4925 MacArthur for 42 years, operating with full BZA approval and enjoying broad community support. The wider community, as represented by last April's 3-1 margin landslide vote of the Palisades Citizens Association, supports St. Patrick's use of this property. The inherent proposition, here, is sound. The status-quo supports our use. Although I understand the nervousness that change—especially that caused by a school—can cause, I have to ask: What has changed about this property, about 4925 MacArthur, between now and a few years back, suddenly to make this site so inappropriate for school use? The answer is...nothing.

Point #2: How low-impact do we expect schools to get?

We have heard that the solutions that St. Patrick's has offered in order to mitigate impacts of school procedures are, themselves, objectionable. For instance, we are substituting shuttle bus drop off and pick-up for traditional carpool lines—and it has been argued that the solution, here— several school buses on MacArthur Boulevard—is in and of itself, objectionable. Arguments have been made that seem to suggest that *any vehicle* bringing a child or teacher to

school at this site, or *any sound* coming from adolescent vocal cords can be called objectionable and therefore be used as reason for denial of this special exception.

This is a highly absurd argument. It is well established that school use is presumed compatible with the residential zone and therefore features of a school's operations that would be typical for *any* school cannot be considered inherently objectionable. ***All*** schools involve children arriving at and departing from the site. No schools muzzle their children. All schools involve the occupancy of a building by students. Each of these things is typical and expected for all our schools in residential zones. Our opposition has not identified a single feature of St. Patrick's operation that is atypical for a school. They have simply identified our efforts to minimize the effect of typical school functions that all schools share.

Point #3: The zoning code doesn't intend schools to have *no* impact: It intends them to take steps to *minimize* impacts.

Schools, clearly, should mitigate their impacts in order to protect the legitimate needs of neighbors. There is a clear standard for independent schools locating in residential zones to pay attention to noise, traffic, and other objectionable conditions. The way the code is written should lead to civil, productive discourse between neighbors and schools *about how to minimize impacts so that residential life is protected*—and I am sure, after working this case for the last year—that schools have many ways they can accommodate legitimate needs of neighbors.

The school we are proposing? I suspect it will be the lowest-impact school on record here in DC. We can do that because we are proposing a limited number of students, and we purchased a building that is already set up for our needs—running a Grades 7 and 8 program with small groups of seminar-styled classes in an academic program. You know the specifics of

our program. It is small and manageable. Those elements that traditionally cause concern are noise traffic, parking and number of students. We think we have overwhelmed the standard for noise, traffic, number of students and other objectionable conditions.

Following section edited out because of the late hour of the hearing:

- ***Noise? We're talking about the sound of children's voices during highly limited intervals. Further, that noise will not exceed existing noise levels in the neighborhood resulting from considerable daytime traffic along MacArthur Boulevard and the airplane flight pattern above. Only the two contiguous neighbors are ever likely to hear a student's voice, and should that be objectionable, we are willing—and have offered—to build fencing that would reduce those sounds.***

- ***Traffic? We have proposed a win-win situation. In designing an appropriate traffic plan for 4925 MacArthur, we have a DDOT-approved plan for substantial and successful changes to our ongoing traffic operations on Whitehaven Parkway. We have already demonstrated success with our carpool initiative, which began last month and is already performing above the target set by DDOT—with a real net reduction in total traffic. Much has been said to malign the nature of our parent community. Suddenly, with this case set out before you, we "are not good neighbors." In particular, you have heard***

testimony that St. Patrick's parents will never follow the traffic plan as proposed. Their actions show otherwise, though. We asked for a renewed dedication to carpooling, and the results are already above DDOT targets.

- ***Number of students? Our maximum requested student population is consistent with what the building has been zoned for already. We have proposed a permanent cap of sixty students, and we cannot even achieve that number until we have demonstrated a year of successful operation with not more than forty students.***

We have been willing to devise conditions, covenants and agreements to address any articulated concerns ranging from absolute controls over future growth, fencing, landscaping, liability issues relating to a neighbor's pool, or parking concerns for one neighbor without a driveway.

Point #4: Our impacts must be compared to the impacts of the prior user

If one test is whether we have successfully minimized impacts, another is whether we perform well when our plan is compared to the impacts of the former owner, which enjoyed broad-based community support. The test is whether we have significantly increased objectionable qualities over their prior levels in the area. *(Draude v. D.C. Board of Zoning Adjustment, 582 A.2d 949, 959-60 (D.C. 1990).* In this case, we are ***substituting one educational use for another,*** so that comparison is easy enough to make.

Our plan is to do much better than the former owner did—and that use was accepted by the neighborhood. How will we do better? Our school involves day-time use instead of evening and night use. Our school involves weekday use, instead of weekend use. We have the ability to park all our cars accessing the site in the parking lot—so we will remove the prior user's reliance on neighborhood streets for parking. We will correct significant existing drainage problems, affecting the contiguous neighbors, Mr. Skrivseth and Ms. Wright, and the National Park Service across the street. And finally, although our students will come and go five days per week—compared to the previous owner's two or three meetings per week—we still compare well if you look at total hours of occupancy of the building, since the Psychoanalysts had office workers on site every weekday .

Point #5: To reassure neighbors, our proposal has multiple layers of enforcement

You have heard assertions that the proposed conditions are not enforceable. It will take a feat, however, not to live by these conditions, as we have included multiple layers of enforcement underpinning this proposal. We have an immediate early checkpoint, with phased enrollment. We have an obligation to meet with the community regularly and to provide detailed annual reports to the Board. Further, through a legal covenant, we remain willing to give significant future control to the nearby neighbors themselves, giving them a "veto" of sorts over future BZA action that could expand the scope of the proposed school beyond 60 students. These three layers of on-going control, with the help of the new zoning enforcement official, should reassure neighbors that we will perform to the standard we are setting out.

Conclusion

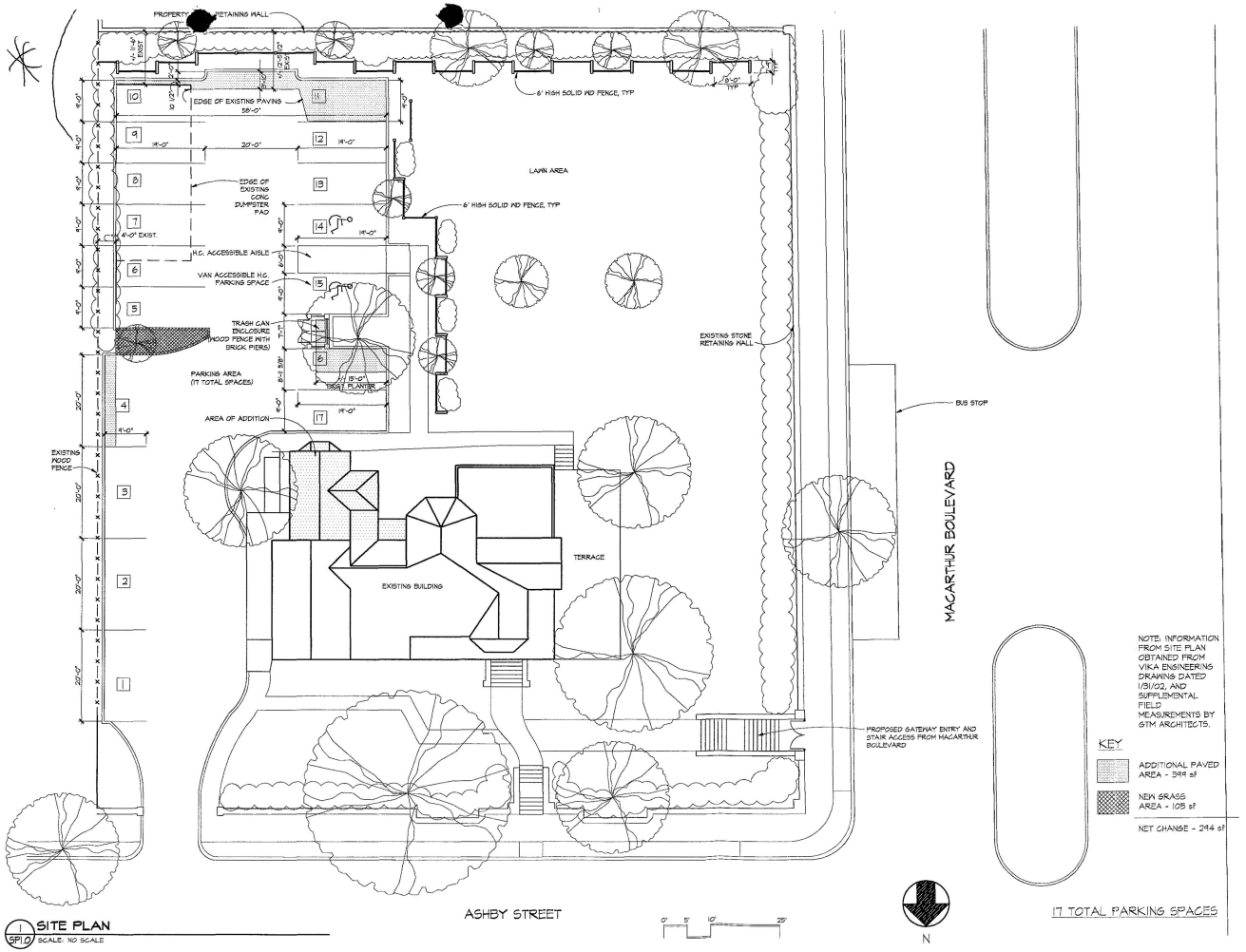
In conclusion, I want to return to who we are as an institution, and as a collection of parents and teachers, wanting what is best for these children, surely, but also, as a faith-based community, wanting harmony restored in our relations with our neighbors. We stumbled into this without anticipating a fight. We saw a site where we could preserve open green space, a site that had a four decade history of educational use—and we thought we would be welcomed. And that was a wrong assumption.

There is a glimmer of hope, however, a hope that goes beyond our simple aspiration to finally use this site we have purchased. If this application is approved, it will have taken almost two years from the point of site identification through to occupancy. If we are approved, we will turn immediately to finishing plans for a $700,000 systems renovation and handicap-upgrade project to be completed before we could welcome students. I raise this specifically in order to remind the Board that we are investing significant resources to bring this building to full handicap accessibility. It is impossible for us to make that commitment with a short term of less than 10 years, in order to justify the investment this building will require.

Our more distant hope, then, beyond occupancy, is that we can work together with this neighborhood for good. That everything we believe about good citizenship and ethical conduct will be on display at 4925 MacArthur Boulevard and that, eventually, there will be harmony between St. Patrick's and its Palisades neighbors. Other schools have faced fierce opposition. And once the school is up and running, harmony and cooperation do return, and most neighbors do admit, later, that their fears were unfounded. The awful scenarios of gridlock and mass firesales just don't come to pass. Instead, communities accept schools within their midst, and move on toward productive, cooperative community life. That state—beyond even the outcome

of this hearing—is what we hope to accomplish. Thank you for your time and patience. On behalf of St. Patrick's whole school community, we are grateful for your consideration.

Document #: 1285770 v.1



NOTE: INFORMATION FROM SITE PLAN OBTAINED FROM VIKA ENGINEERING DRAWING DATED 1/31/02, AND SUPPLEMENTAL FIELD MEASUREMENTS BY GTM ARCHITECTS.

KEY

ADDITIONAL PAVED AREA - 399 sf

NEW GRASS AREA - 105 sf

NET CHANGE - 294 sf

1 SP1.0 SITE PLAN
SCALE: NO SCALE

GTM ARCHITECTS
1045 ARMORY AVENUE,
KENSINGTON, MD. 20895
(301)942-1082
(301)942-3924 FAX

4625 MACARTHUR BLVD, NW
WASHINGTON, DC 20007
SITE PLAN

ST. PATRICK'S EPISCOPAL DAY SCHOOL

REVISIONS:

SEAL:

DRAWN BY: TM, JAA
CHECKED BY: DPK
SCALE: AS NOTED
DATE: 11.06.22
PROJECT NO. 01.0649
DRAWING NO. SP1.0

Overview of Use of Outdoor Space on the Property

During the final hearing, the Applicant was asked to present a general schedule of the school day to allow for a better understanding of the potential use of the outdoor space.

Arrival/Departure At arrival time, all students will leave the bus, enter the building via the front door, and proceed to classrooms or the common area. At dismissal time, all students will be dismissed to the bus from classrooms. Arrival and departure will not involve the use of the lawn as a waiting area.

Morning Break One grade level will break from 9:30 to 9:45 a.m. The other grade level will break from 9:45 to 10:00 a.m. We estimate that two-thirds of the group - or 20 students at full enrollment of 30 per grade level - would choose to be on the green space or on the terrace overlooking MacArthur Boulevard. Others would use library space, classrooms, or common areas inside the building for conversation, games, and study. Twenty students on the green space or on the terrace will not overtax those spaces.

Lunch Break Each grade level will have a 40-minute period for a lunch break. Generally, students will eat lunch indoors. After eating lunch, they will have an opportunity for outside play if weather permits. One grade level will have a lunch break from 11:25 a.m. to 12:05 p.m., with outdoor time from 11:45 a.m. to 12:05 p.m. The other grade level will have a lunch break from 11:50 a.m. to 12:30 p.m., with outdoor time from 12:10 to 12:30 p.m.

Afternoon There will be no afternoon break. The academic day ends at 2:45 p.m., followed by sports time, so no additional break is needed.

Classroom Time The students will be on the premises approximately seven hours on school days, although they will leave the premises from time to time for field trips, museum education, and service learning activities. For any one student, approximately six of those hours per day will be devoted to classroom, advisory, study hall, and chapel time across the week. From time to time, on a sunny spring day for instance, teachers may choose to conduct class outside on the lawn. Such class meetings would comprise lecture, discussion, and writing - directed by the teacher - conducted in much the same manner, and at much the same volume, as classroom-based activities.

General Schedule for Outdoor Time*

9:30 - 10:00	30 minutes
11:45 - 12:05	20 minutes
12:10 - 12:30	20 minutes
Total	70 minutes

* *This document is presented to provide a general sense of the timing and extent of the use of the outdoor space. Any type of condition limiting outdoor time to specific time intervals would be difficult to enforce and would impair scheduling flexibility.*

The Office of Planning has reviewed the BZA Orders for a number of schools such as the Field School, the Georgetown Day School, the Washington International School, and St. Patrick's School on Whitehaven Parkway and have found that none have a time limit on their special exception.

COMMUNITY LIAISON COMMITTEES

The following are two community liaison committees that are currently in operation:

The Washington International School (BZA 16177) was approved on January 8, 1997 and February 5, 1997. The Board recommended the establishment of a liaison committee with ANC 2E. The liaison committee includes representatives of the Burleith Citizens Association and the Cloisters West Homeowners Association. The quarterly meetings are organized by the school. OP was informed that the community and the school have a healthy relationship. This was verified by Peter Pulsifier, the chairman of ANC 2F. The committee does not publish a report but a summary of the meeting is reported in the local paper.

The Georgetown University, Rock Creek International, and Washington International schools all have community liaison committees that meet quarterly. The quarterly meetings are organized by the schools but the community has input on the agenda. Len Levine, of ANC-2E, verified the good community relationships.

CONDITIONS OF APPROVAL

Based on information provided at the public hearing OP has reviewed the conditions of approval submitted in our report and are proposing the following amendments:

1. Condition #1 was revised to cap the school enrollment at 40 students.

2. Condition #2 was revises to detail the number of full-time and part-time faculty and staff.

3. Condition #13 was revised to address buffering.

4. Condition #17 was revised to strongly recommend that the applicant institute a community outreach program to address community concerns.

5. Condition #18 was deleted as it addressed an increase in enrollment.

6. Add a new condition to limit the special exception to a period of 10-years.

Revised Conditions

1. The maximum enrollment shall be limited to 40 students in grades 7 and 8.

2. Combined, the number of faculty and staff will not exceed 8 full-time and 4 part-time persons.

3 The building shall be open for school use from 7:30 a.m. to 4:00 p.m. Staff/faculty may arrive earlier or stay later, but in no event shall they be permitted on the premises after 6:00 p.m.

4 No more than two evening school events, such as back-to-school night, shall be held after 4:00 p.m. during the school year.

5. There shall be no summer school program at the Subject Property.

6. The school may not allow any outside groups or persons to rent any portion of the building at any time.

7. Students who do not walk to school or arrive by public transportation shall be dropped off at the gym on Whitehaven Parkway between the hours of 7:30 a.m. and 7:55 a.m. The students will then be shuttled to the subject property. The shuttle vehicle will arrive at the site by traveling on MacArthur Blvd. The vehicle will stop and discharge students at the existing bus stop in front of the building. The shuttle will return to Whitehaven via the approved shuttle route. The pick-up of students in the afternoon shall be from the gym on Whitehaven Parkway. Parents will not be permitted to drop off or pick up children at the subject property at arrival and dismissal times, except in special circumstances such as when a child is late due to a doctor's appointment.

8. The Applicant shall install and operate any lighting of the parking facilities so that it is directionally downlit with minimum light candlepower.

9. There will be no organized sports conducted on the property. Outdoor activity on the property shall be limited to casual recreational use.

10. The site shall contain 15 parking spaces.

11. The applicant shall schedule all deliveries to take place from 9:30 a.m. to 4:00 p.m. Monday through Friday.

12. A car pool program will be established, instituted, and monitored by the school and should be approved by DDOT. The applicant shall submit an evaluation and progress report to DDOT for its evaluation of the program on a yearly basis.

13. Fencing along the southern property line will be provided at the applicant's expense if requested by the property owner.

14. Expansion of the building will be limited to the area necessary for access as shown in the Site Plan.

15. Large commercial trash dumpsters are prohibited.

16. The applicant shall coordinate with the National Park Service in developing and implementing storm water management controls.

17. The applicant shall establish and maintain a community liaison program to address community concerns. The committee shall include representatives of ANC-3D and the Palisades Citizens Association. The applicant shall conduct meetings of the community liaison committee at least quarterly. Notice of the meetings shall be given to the liaison committee members and the owners of all property within 200 feet of the site.

18. The special exception will be valid for a period of 10 years.

AA/mbr

WELLS & ASSOCIATES, LLC
TRAFFIC, TRANSPORTATION, and PARKING CONSULTANTS

November 4, 2002

Geoffrey Griffis, Chairman
District of Columbia Board of Zoning Adjustment
441 Fourth Street
Suite 200
Washington, D.C.

Re: St. Patrick's School - 4925 MacArthur Boulevard
BZA Application No. 16852
Post Hearing Traffic Submission

Dear Chairman Griffis:

As requested by the Board of Zoning Adjustment (BZA) at the October 8 hearing regarding St. Patrick's, this letter presents:

1. Clarification of traffic data transmitted to you by Wells & Associates on July 3, 2002 and subsequently transmitted to the BZA on July 5, 2002.

2. Data regarding auto occupancy in St. Patrick's carpool lane, before and after implementation of the carpool initiative this fall.

Traffic Data

Overview. The opponents' traffic expert, Jawahar Mehra, claimed that there were "errors" and "discrepancies" in the traffic data transmitted to the BZA on July 5, 2002. In fact, there were no "errors" or "discrepancies".

Balances. Differences between the raw December 2001 counts presented in the count sheets and the volumes used in the capacity and queuing analyses are attributable to imbalances in the raw traffic counts between driveways.

As shown in the attached figures, the peak 15-minute inbound raw count during the AM peak hour was 115 vehicles. The peak 15-minute outbound raw count was 96 vehicles.

Decreasing the inbound volume by eight (8) vehicles to 107 vehicles, and increasing the outbound volume by 11 vehicles to 107 vehicles, balanced these volumes. Increasing the eastbound volume east of the west drive, and decreasing the eastbound volume west of the east drive, by 11 vehicles to total 74 vehicles balanced eastbound traffic along Whitehaven Parkway.

During the PM peak 15-minute period, inbound and outbound traffic balanced. Minor changes were made to exiting traffic volumes and traffic on Whitehaven Parkway to achieve a better balance for eastbound and westbound traffic.

Industry Practice. Standard traffic engineering practice is to use observed peak hour traffic volumes in capacity analyses. Wells & Associates multiplied the balanced peak 15-minute volumes by four to derive peak hour flow rates that reflect the sharp St. Patrick's traffic peaks. The hourly traffic volume used in the AM peak hour analysis (428 vehicles) is 206 vehicles, or 93 percent, greater than the actual number of vehicles turning into the St. Patrick's driveway (222 vehicles) in December 2001. The hourly traffic volume used in the PM peak hour analysis (240 vehicles) is 105 vehicles, or 78 percent, greater than the actual number of vehicles turning into the St. Patrick's driveway (135 vehicles) in December 2001.

Average Vehicle Occupancy

Findings. The attached tables and pie charts show average vehicle occupancy (AVO) in the St. Patrick's carpool lane before and after the carpool initiative that was implemented this fall. Data are presented for the AM and PM peak hours and for the AM and PM peak periods.

The AM peak hour occurs at 7:30 to 8:30 AM; the PM peak hour occurs at 2:30 to 3:30 PM. The 1.5-hour AM peak period occurs at 7:00 to 8:30 AM; the two-hour PM peak period occurs at 2:30 to 4:30 PM.

The carpool initiative has increased the ***AM peak period*** AVO from 1.39 to 1.80 students per vehicle, or by 29 percent. ***PM peak period*** AVO has increased from 1.34 to 1.70 students per vehicle, or by 27 percent.

Peak hour AVO increases are even more impressive. ***AM peak hour*** AVO increased from 1.41 to 1.82 students per vehicle, or by 29 percent. ***PM peak hour*** AVO has increased from 1.33 to 1.85 students per vehicle, or by 39 percent.

Goal Achieved. These findings prove that the St. Patrick's carpool initiative can achieve a peak period AVO goal of 1.6 students per vehicle or greater. The St. Patrick's community can change, and indeed has changed, their travel behavior to reduce both the volume and duration of peak period traffic.

Mr. Mehra claimed at the BZA hearing that the St. Patrick's carpool program would be extremely difficult to implement and that the traffic management plan would not work. These claims are bald and unsubstantiated. As it turns out, they are simply wrong.

Mr. Mehra could have conducted his own observations and traffic counts. He failed to do so. If he had conducted counts he, too, would have observed that the St. Patrick's carpool program works.

Significance of Findings. Mr. Mehra claimed that the Foxhall Road/Whitehaven Parkway intersection would operate at an unacceptable level of service (LOS) "F" rather than LOS "C" due to the combined impacts of St. Patrick's, the George Washington University/Mount Vernon Campus (GMU/MVC), and The Field School.

Mr. Mehra based his opinion, at least in part, on the GWU/MVC traffic forecasts cited in the Palisades Traffic Impact Study published by the Traffic Services Administration, District Division of Transportation, dated August 2002.

Mr. Mehra neglected to indicate that the Palisades Traffic Impact Study forecasts that the Foxhall Road/Whitehaven Parkway intersection would operate at an acceptable LOS "B", during both the AM and PM peak hours, one and five years into the future. This intersection is forecasted in the Palisades Traffic Impact Study to operate at LOS "C" in the AM peak hour and LOS "B" in the PM peak hour 10 years into the future.

The Palisades Traffic Impact Study included traffic that would be generated by St. Patrick's, GWU/MVC, The Field School, and the proposed mayor's mansion. That study endorses the new traffic signal at the Foxhall Road/Whitehaven Parkway intersection; elimination of parallel curb parking on Whitehaven Parkway; construction of sidewalk, a raised crosswalk, and speed humps on Whitehaven Parkway; and relocation of the entrance to the St. Patrick's carpool lane.

Mr. Mehra wrote an October 31, 2000 letter to Ms. Cathy Wiss, President, Tenleytown Neighbors Association regarding the traffic impacts of Albemarle Associates' application for 12 townhouses to the District of Columbia Zoning Commission. Mr. Mehra stated in that letter:

> "Due to the close proximity of the intersections analyzed and the definite impact of the intersections on each other, the Highway Capacity Manual (HCM) or the Highway Capacity Software (HCS) is not the correct technique to estimate delays and levels of service. The results based on the HCS analysis will not reflect real world conditions."

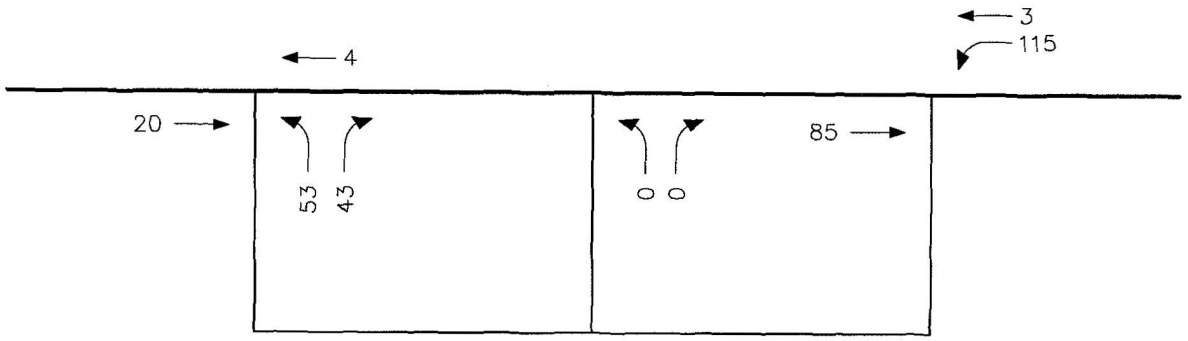
Mr. Mehra failed to take his own advice in this case. According to his own testimony he used the Highway Capacity Manual (HCM) capacity analysis technique to evaluate St. Patrick's traffic impacts. Both the Palisades Traffic Impact Study and Wells & Associates traffic study used the Synchro capacity analysis technique that takes into account the real world interaction among adjacent intersections.

The Palisades Traffic Impact Study findings are consistent with the findings of the Wells & Associates studies for St. Patrick's. Both indicate that the Foxhall Road/Whitehaven Parkway intersection will operate at acceptable levels of service well into the future with additional St. Patrick's traffic. Both of these studies are conservative since neither includes the demonstrated success of the St. Patrick's carpool initiative.

Please call me regarding any further comments or questions regarding this matter.

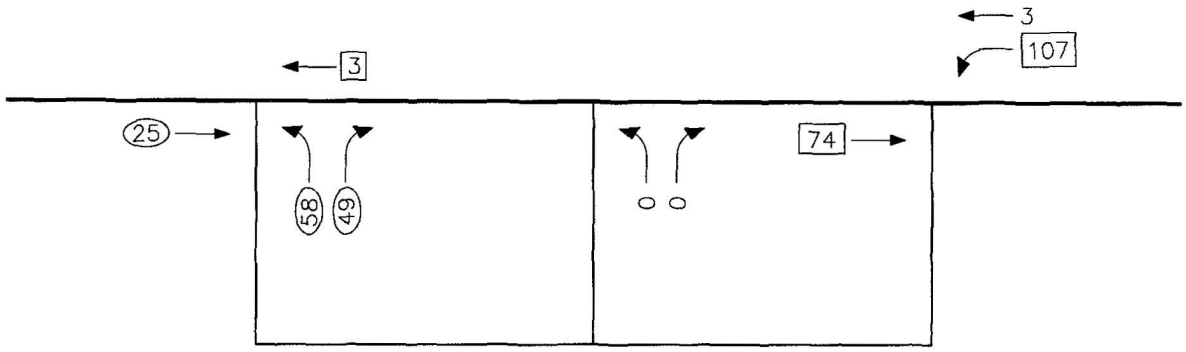
Sincerely

Martin J. Wells, P.E.
President



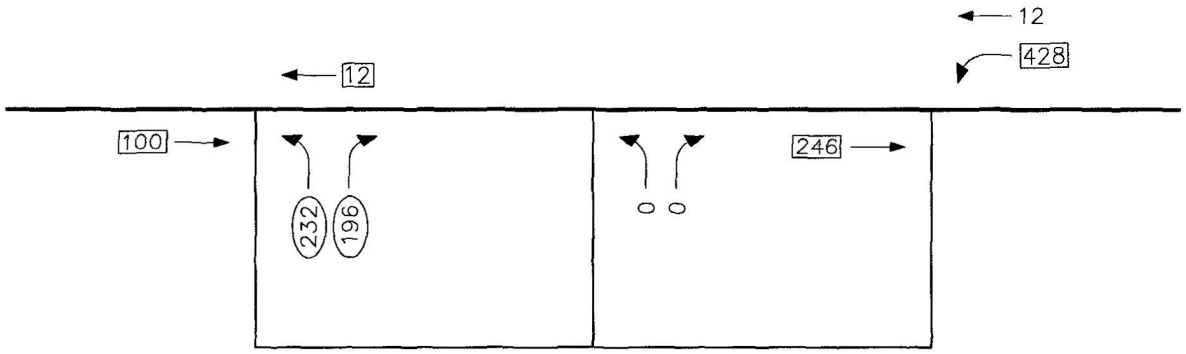
Raw Peak 15 Minute Counts

IN	OUT
115	96



Balanced Peak 15 Minute Volumes

IN	OUT
107	107



Four Times Balanced 15 Minute Volumes

0:\Projects\1722 St. Patricks Episcopal School\Graphics\Driveway Volumes-DAO

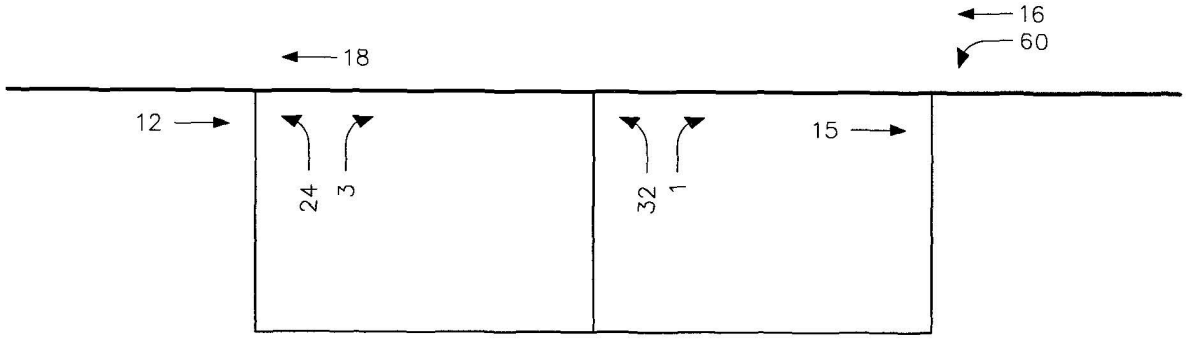
Figure 1
St. Patrick's EDS Driveway, AM Peak Period
Traffic Volumes

Volume Increased Due To Balancing

Volume Decreased Due To Balancing

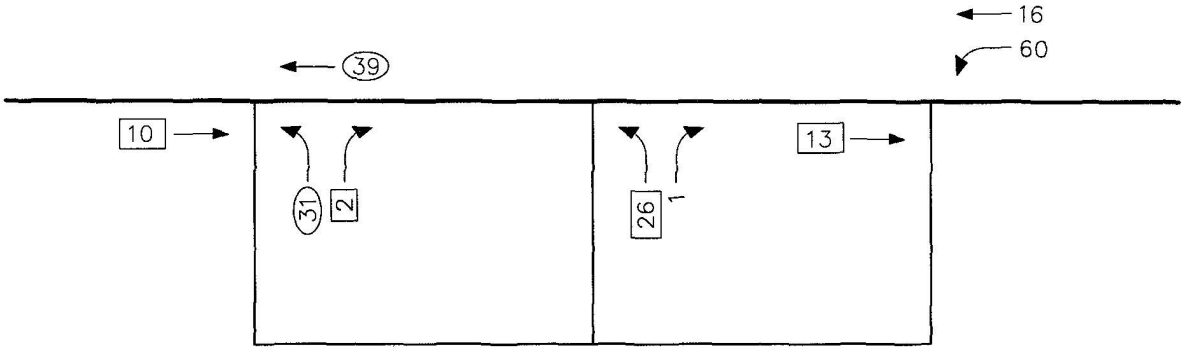
St. Patrick's Episcopal School
Washington, D.C.

WELLS & ASSOCIATES, LLC.
TRAFFIC, TRANSPORTATION, and PARKING CONSULTANTS



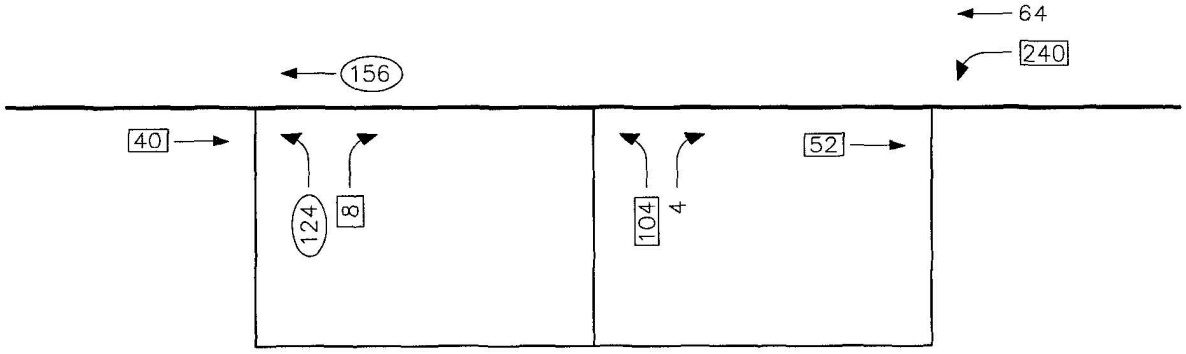
Raw Peak 15 Minute Counts

IN	OUT
60	60



Balanced Peak 15 Minute Volumes

IN	OUT
60	60



Four Times Balanced 15 Minute Volumes

O:\Projects\1722 St. Patricks Episcopal School\Graphics\Driveway Volumes-DAO

Figure 2
St. Patrick's EDS Driveway, PM Peak Period
Traffic Volumes

Volume Increased Due To Balancing

Volume Decreased Due To Balancing

St. Patrick's Episcopal School
Washington, D.C.

WELLS & ASSOCIATES, LLC.
TRAFFIC, TRANSPORTATION, and PARKING CONSULTANTS

Wells & Associates, LLC

McLean, Virginia

Existing Traffic Count - Before Car Pool Program

PROJECT:	St. Patrick Episcopal Day School	DATE:	January 31, 2002
W & A JOB NO.:	1722	DAY:	Thursday
LOCATION:	St. Patrick's School	WEATHER:	nice
JURISDICTION:	Washington ,DC	COUNTED BY:	Agan Husadzinovic
		INPUTED BY:	John Andrus

	St. Patrick's School Number of Passengers								Total Vehicles	Total Passengers	Students Per Vehicle
Passengers Time	1	2	3	4	5+						
AM											
7:00-7:15	0	0	0	0	0				0	0	N/A
7:15-7:30	9	0	0	0	0				9	9	1.00
7:30-7:45	19	7	1	0	0				27	36	1.33
7:45-8:00	35	18	6	1	1				61	98	1.61
8:00-8:15	70	24	3	0	0				97	127	1.31
8:15-8:30	19	8	2	0	0				29	41	1.41
AM Peak Period	152	57	12	1	1				223	311	1.39
One-Hour Totals											
7:00-8:00	63	25	7	1	1				97	143	1.47
7:15-8:15	133	49	10	1	1				194	270	1.39
7:30-8:30	143	57	12	1	1				214	302	1.41
AM Peak Hour											
7:30-8:30	143	57	12	1	1				214	302	1.41
PM											
2:30-2:45	3	2	0	0	0				5	7	1.40
2:45-3:00	23	8	0	0	0				31	39	1.26
3:00-3:15	27	10	2	0	0				39	53	1.36
3:15-3:30	20	11	0	0	0				31	42	1.35
3:30-3:45	4	0	0	0	0				4	4	1.00
3:45-4:00	2	2	0	0	0				4	6	1.50
4:00-4:15	35	17	1	0	0				53	72	1.36
4:15-4:30	6	1	0	1	0				8	12	1.50
PM Peak Period	120	51	3	1	0				175	235	1.34
One-Hour Totals											
2:30-3:30	73	31	2	0	0				106	141	1.33
2:45-3:45	74	29	2	0	0				105	138	1.31
3:00-4:00	53	23	2	0	0				78	105	1.35
3:15-4:15	61	30	1	0	0				92	124	1.35
3:30-4:30	47	20	1	1	0				69	94	1.36
PM Peak Hour											
2:30-3:30	73	31	2	0	0				106	141	1.33

Wells & Associates, LLC

McLean, Virginia

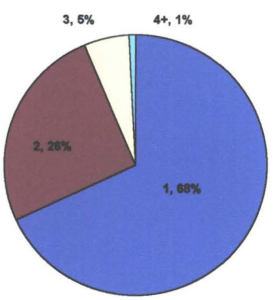
Existing Traffic Count - After Caprool Program

PROJECT:	St. Patrick Episcopal Day School	DATE:	September 25, 2002
W & A JOB NO.:	1722	DAY:	Wednesday
LOCATION:	St. Patrick's School	WEATHER:	nice
JURISDICTION:	Washington ,DC	COUNTED BY:	Agan Husadzinovic
		INPUTED BY:	John Andrus

	St. Patrick's School Number of Passengers								Total Vehicles	Total Passengers	Students Per Vehicle
Passengers Time	1	2	3	4	5+						
AM											
7:00-7:15	1	0	0	0	0				1	1	1.00
7:15-7:30	5	1	0	0	0				6	7	1.17
7:30-7:45	13	8	2	2	3				28	59	2.11
7:45-8:00	30	40	9	1	4				84	165	1.96
8:00-8:15	34	35	6	0	1				76	127	1.67
8:15-8:30	12	4	1	0	0				17	23	1.35
AM Peak Period	95	88	18	3	8				212	382	1.80
One-Hour Totals											
7:00-8:00	49	49	11	3	7				119	232	1.95
7:15-8:15	82	84	17	3	8				194	358	1.85
7:30-8:30	89	87	18	3	8				205	374	1.82
AM Peak Hour											
7:30-8:30	89	87	18	3	8				205	374	1.82
PM											
2:30-2:45	4	2	5	2	2				15	41	2.73
2:45-3:00	8	13	10	4	2				37	93	2.51
3:00-3:15	25	33	4	0	0				62	103	1.66
3:15-3:30	35	4	2	0	0				41	49	1.20
3:30-3:45	4	1	0	0	0				5	6	1.20
3:45-4:00	3	1	0	1	0				5	9	1.80
4:00-4:15	31	11	2	0	0				44	59	1.34
4:15-4:30	10	5	0	0	0				15	20	1.33
PM Peak Period	120	70	23	7	4				224	380	1.70
One-Hour Totals											
2:30-3:30	72	52	21	6	4				155	286	1.85
2:45-3:45	72	51	16	4	2				145	251	1.73
3:00-4:00	67	39	6	1	0				113	167	1.48
3:15-4:15	73	17	4	1	0				95	123	1.29
3:30-4:30	48	18	2	1	0				69	94	1.36
PM Peak Hour											
2:30-3:30	72	52	21	6	4				155	286	1.85

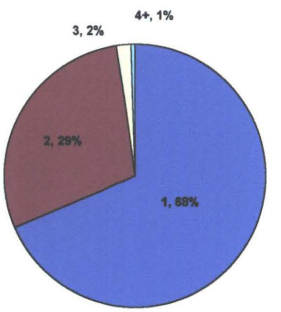
St. Patrick's Episcopal Day School
Average Vehicle Occupancy (AVO)
Before and After Carpool Program

AM Peak Period
(7:00 - 8:30 AM)



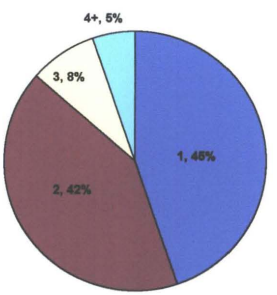
AVO = 1.39

PM Peak Period
(2:30 - 4:30 PM)

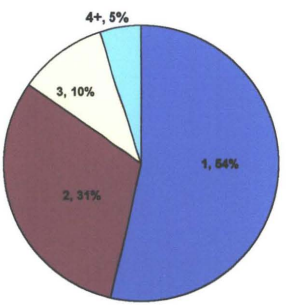


AVO = 1.34

Before



AVO = 1.80
+ 0.41
+ 29%

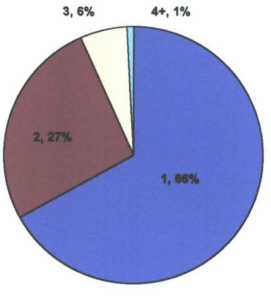


AVO = 1.70
+ 0.36
+ 27%

After

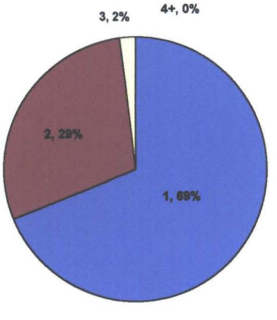
St. Patrick's Episcopal Day School
Average Vehicle Occupancy (AVO)
Before and After Carpool Program

AM Peak Hour
(7:30 - 8:30 AM)



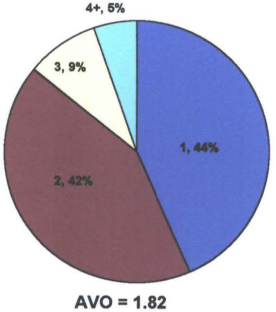
AVO = 1.41

PM Peak Hour
(2:30 - 3:30 PM)

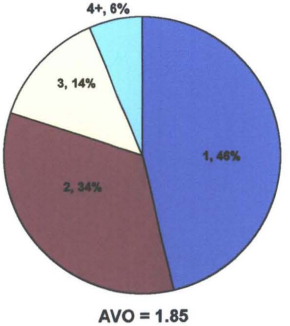


AVO = 1.33

Before



AVO = 1.82
+ 0.41
+ 29%



AVO = 1.85
+ 0.52
+ 39%

After