NEIGHBORS UNITED FOR LIVABLE STREETS

September 30, 20003

Oct. 1, 2003 3:39 BZA

Mr. Geoffrey H. Griffis, Chairman
Board of Zoning Adjustment
441 4th Street, N.W.
Washington, D. C.

Ref: Case #17022

Dear Sir,

As requested by the BZA at the hearing on July 15 re the application of the Burke School for a special exception, I enclose two copies of the testimony of Mr. Joe Mehra of MCV Associates on the traffic management plan of the Burke School on behalf of NULS, in opposition to the Burke School apllication.

I hereby certify that I have served this day a copy of this same correspondence, by hand, by fax, or by US mail, properly stamped for First Class mail service, to the following parties to this hearing:

Mr. Stephen Cochran
Office of Planning
801 N. Capitol Street, N.W., 4th Floor
Washington, D. C. 20002

ANC 3F
c/o Mr. Stephen Dennis
3901 Connecticut Avenue
Washington, D. C.

Ms. Colleen Smith
Department of Public Works
2000 14th ST., N. W. 5th Floor
Washington, D. C. 20009

Edmund Burke School
c/o Phil Feola and Sarah Shaw
Shaw, Pitman
2300 N Street, N. W.
Washington, D. C. 20037

Mrs. Linda Jay
2951 Upton Street, N. W.
Washington, D. C.

Thomas P. Brown Management, Inc
4545 42 Street, N.W.
Suite 301
Washington, D. C. 20016

BZA
Case No. 17022
Exhibit No. 130

Board of Zoning Adjustment
District of Columbia
CASE NO. 17022
EXHIBIT NO. 130

Van Ness South Tenants Association
c/o Mr. Pat Brown
Greenstein, Delorme and Luchs
1620 L Street, N. W.
Washington, D. C. 20036

NARDS
C/o Ms. Dierdre Karambelas
2938 Upton Street, N. W.
Washington, D. C. 20008

Sincerely yours,

Richard W. Richardson
Secretary

cc: Mr. Anthony Hood
Ms. Ruthanne Miller
Mr. Curtis Etherly, Jr.
Mr. David Zaidain

TESTIMONY OF JOE MEHRA, P.E., PRESIDENT
MCV ASSOCIATES, INC., TRAFFIC CONSULTANTS
IN OPPOSITION
TO EDMUND BURKE SCHOOL APPLICATION

I. Summary and Conclusions

We have reviewed and analyzed the traffic report of April 14, 2003, by Wells & Associates for the Burke School in connection with its application to the BZA (Case #17022) for a special exception. We have reached several conclusions about this report, which are summarized as follows:

(1) The Wells existing traffic volume data is significantly less than the DDOT data; and its conclusions are therefore **invalid.**

(2) The proposed Traffic Management Plan developed by Burke is **unrealistic and unenforceable.**

(3) The proposed driveway entrance on Connecticut Avenue to the new structure will impede and slow traffic on that major artery during peak hours, a conclusion hard to avoid after observing the present daily morning flow of northerly traffic on two lanes of Connecticut Avenue between Tilden and Albemarle streets.

(4) Although the proposed plan will reduce the twice-daily lineup of cars in front of the existing school structure on Upton Street, **it will not reduce** --in fact the Burke expansion will **increase** --the actual number of vehicles on Upton Street. The plan thus offers no real traffic reductions on Upton Street with a new entrance on Connecticut Avenue.

(5) A fully BZA-compliant school with 270 students and 35 faculty without a TMP will generate **less** vehicle trips than the proposed 320 students and 70 faculty with a TMP.

II. Comments on Wells & Associates Report of April 14, 2003

The subject of the Wells Report is the roadway network in the vicinity of the Burke School consisting of the heavily-traveled major arterial Connecticut Avenue, Upton Street, Van Ness Street, Tilden Street, and the public alleys between Veazey Terrace and Tilden Street. Upton and Van Ness are residential streets. Upton Street is narrow with parking on both sides, and provides access to several institutions: Howard Law School, the Levine School of Music, the Hillwood Museum, and the chancery of the Netherlands Embassy. Van Ness is a dead end street to the east of Connecticut Avenue. The public alleys connecting Veazey Terrace to Van Ness Street, Van Ness to Upton, and Upton to Tilden Streets are used for access to and from the School. Running east-west and opening only into the Van Ness-Upton alley is the rear alley of six residences lying in a line from Burke School eastward; the residents' parking spaces and garages are behind their houses, so that the Van Ness-

Upton alley is their only egress.

Errors in Existing Data and Calculation of Existing Levels of Service

The Report contains a number of serious errors in its traffic analysis in this area. The turning movement counts were conducted by Wells on Tuesday, January 14, 2003. DDOT conducted its Connecticut Avenue study at about the same time. DDOT collected turning movement counts at the Connecticut Avenue intersections on four different days and the results were averaged to reflect a typical day count.

A comparison of the Wells and the DDOT counts shows **significant differences** in traffic volumes on Connecticut Avenue. For example, northbound Connecticut Avenue volumes at Tilden Street in the PM peak hour are given as 1,798 vehicles by Wells, but 1,917 by DDOT. Similarly, Wells gives 1,888 at the Upton Street intersection, versus 2,139 by DDOT. Again, the Van Ness intersection is counted at PM peak by Wells as 1,443 northbound and as 1,962 by DDOT , and 655 (Wells) versus 850 (DDOT) southbound.

These differences are **not** due to daily variations in traffic. Their findings based on these counts are therefore **not valid.**

A major error is the assumption made by the Wells Report that Connecticut Avenue operates three lanes northbound and three lanes southbound during the AM and PM peak hours. In fact, Connecticut throughout the relevant stretch operates four lanes southbound and two northbound in the AM peak hours, and the reverse in the PM peak. **Obviously, the levels of service results based on that error are not correct.**

The Wells Report shows the number of private vehicle trips for the existing school site in Table 4-2. Those numbers do not match the Wells student survey data results. For example, the student survey shows that a total of 167 Burke students, or 56.4 percent of the total, are driven to school. At an average occupancy of 1.33 students per vehicle, this translates to 126 vehicles during the morning period. The student arrival rate during the morning school peak hour (7:15 to 8:15AM) is approximately 79 percent, or 99 vehicles (in each direction). The Wells table shows only 86 trips, thus underestimating school vehicle trip generation by almost 11 percent. This underestimate is carried forward to the analysis of the future school trip generation after expansion

Errors in Calculating Future Traffic Volumes

Future traffic volume consists of existing traffic volumes, the normal growth in through traffic volumes, the additional traffic to be expected from other developments, and the traffic from the proposed school expansion. The Wells report has not "grown" the traffic that was counted in January 2003 to the future year that the school expansion would be completed and has not included projections of traffic from other planned/approved developments in the area.

In summary, the Wells Report underestimated total future levels of service by using erroneous data and assumptions, including most importantly:

1. Between 11 and 26 percent lower current volumes of traffic on Connecticut Avenue than used in the DDOT study done at virtually the same time

2. Approximately 11 percent lower vehicle trip generation for the school traffic.

3. Errors in the number of lanes on Connecticut Avenue flowing north and south during peak hours in calculating of levels of service.

4. Estimates of future traffic volumes that are further distorted by failure to take account of normal growth in through traffic and related components that contribute to it.

III. The Burke Traffic Management Plan

We have examined the assertion of the Burke School and its traffic consultants that the proposed Traffic Management Plan (TMP) and the Compliance/Enforcement Plan will make school traffic after expansion "better than today." We find that assertion to be incorrect. The plan will actually increase traffic and will spread it over the roadway network consisting of Connecticut Avenue, the public alleys, Upton, Tilden and 29th Streets. The following considerations bear on this conclusion:

Burke's Traffic Plan creates an unrealistic, unworkable and unenforceable round-about loop that actually increases traffic onto residential streets and Connecticut Avenue.

- The TMP has vehicles entering and dropping off students at so many (eleven) different places (including Connecticut Ave , Tilden & 29th Street, Van Ness St) that it has spread the traffic and congestion impacts where they did not exist before.

- A plan where students have to walk two or three blocks to reach school puts students at risk. It does not take into account inclement weather and heavy loads that children carry to school.

- Despite the effort to reduce traffic on Upton Street, it turns out that the TMP, in effect, encourages the school traffic to turn left and exit eastbound onto Upton Street from the school driveway. There is therefore no real traffic reduction on Upton Street from placing the school entrance on Connecticut Avenue.

- The alternatives to exiting eastbound onto Upton Street are equally burdensome. Traffic that turns right to exit westbound onto Upton Street would pile up at the intersection with Connecticut Avenue, where there is no light and where only a northbound turn is feasible. A southbound, left turn is virtually impossible in the morning rush hour. Inevitably, a noticeable fraction of traffic–in violation

of the TMP–opts to reach Connecticut Avenue by crossing into the Upton-Tilden alley to exit westbound onto Tilden Street. That alternative adversely affects the egress of residents of Tilden and Upton Streets, as well as those on Connecticut Avenue between Tilden and Upton Streets. Not only does it result in congestion in the alley, but it increases the likelihood of accidents at the intersection of the alley and Tilden Street, which is heavily trafficked particularly in the morning rush hours.

- The one-way public alley runs adjacent to the proposed Burke exit, creating an unsafe intersection with complex vehicular turning and conflict points as well as pedestrian conflict points.. Even with police traffic management at this juncture, delays, congestion, confusion, and unsafe conditions are inevitable.

- The proposed Connecticut Avenue entrance to the school will have an adverse impact on AM traffic on that avenue. Since southbound vehicles cannot cross AM peak hour traffic to enter the driveway directly, the plan requires them to approach from the south. To accomplish this, southbound vehicles must make **five** different turning movements: right on Van Ness to Reno; left to Tilden; then left to Connecticut and right in to the school. It is predictable that parents will follow the path of least resistance, cutting eastward at Van Ness to the public alley and dropping off at sites that are both unsafe and in violation of the TMP.

- The Burke shuttle bus was planned to alleviate the burden of remote student drop-off points. But rather than ameliorating morning traffic, it led to an increase, based on the data provided by Wells. Table 3.3 of that report shows that 17 students take the shuttle in the morning period. Table 4.2 shows that the shuttle makes 17 trips in each direction, or a total of 34 trips, to carry 17 students. Evidently this program is not reducing vehicular traffic.