Traffic Analysis

1. **Current Level of Service in neighborhood is unacceptable.** Conn/Van Ness and Conn/Tilden intersections at morning school peak hours and Upton/Conn intersection during evening school peak hours are currently experiencing LOS of E or F (Source: OP report, pg 10). Moreover, in addition to the unacceptable LOS during peak traffic hours, there is congestion from the school all day long, particularly along Upton, as students are picked up and dropped off during all times of the school day for medical appointments, athletic events, conferences, school trips, etc.

2. **Level of Service at two major intersections, and the overall congestion, will worsen under proposed TMP.** The current LOS at the Conn/Tilden and Conn/Van Ness intersections and overall congestion in the area will worsen if more students, more faculty, more parking spaces, and more cars are added to the Burke population, as proposed by the application. DDOT acknowledges that the proposed expansion will worsen the LOS 1 and 2 blocks away (i.e., at Conn/Van Ness and Conn/Tilden intersections) (Source: OP report, pg 10). In fact, DDOT recognizes the future level of service will be F and F at these intersections by the time the school expansion is complete (Source: *DDOT Conn. Ave. Study*).

3. **DDOT's proposed no-left turn from Upton to Conn will increase the traffic on Upton St, Tilden St, 29th St, and in the Upton – Tilden alley.** Burke traffic that wants to go south on Connecticut, after dropping off children in the morning, will be forced, upon exiting from the Van Ness-Upton alley, to turn left onto Upton and obtain access to Connecticut via Tilden Street by turning right into the Upton-Tilden alley and waiting to exit onto Tilden, or by proceeding east along Upton and turning right onto 29th Street, and then waiting at the stop sign at Tilden-29th Street to turn right into Tilden. In either case, cars will back up in the Upton-Tilden alley, and on 29th Street, as cars wait to turn right onto Tilden. Moreover, the Upton-Tilden alley is not passable for approximately fifteen minutes each morning because a private garbage collector uses the Upton-Tilden alley to collect garbage at the rear of the apartment houses on Connecticut, between Tilden and Upton.

4. **The proposed TMP will have a detrimental effect on northbound Conn. Ave. during the morning drop-off period.** There are only two northbound lanes on Conn. Ave. between 7 and 9:30 AM. The left northbound lane is for cars turning left onto Van Ness. The right northbound lane accommodates all other northbound traffic. Currently, traffic in the left northbound lane stacks up, often back to Tilden Street, because the traffic can turn left only on the left green arrow. Therefore, northbound traffic heading for any area north of Van Ness uses the right lane. The right northbound lane also stacks up as traffic waits for cars turning right from Conn. Ave. into Van Ness, the gas station, and the parking lot under the Giant. Under the proposed TMP, the right lane traffic will become even more congested because it will now include all Burke traffic turning right onto Conn. Ave. <u>after</u> depositing children at the school **and** all Burke traffic coming from south of Upton <u>before</u> dropping children at Burke.

5. **DDOT's statement that the current application would not *significantly* increase traffic circulation problems is based on a faulty premise.** (Source: OP report, pg 12). DDOT erroneously compares the trial TMP (based on the current student/faculty population) with the traffic projected under the proposed TMP (based on the expanded enrollment of 300). It finds no significant increase in traffic because the proposed population limit is not that much greater than the current population. The correct comparison, however, is between what the population should be under the BZA ruling (270 students, 35 faculty) and the proposed population under the application. Using the correct comparison, the traffic will increase significantly, regardless of how fine-tuned the TMP may be.

6. **An alternate use of the land would have a smaller impact on traffic than the proposed application.** An alternate use of the land presented by OP would be a 55-unit apartment development (Source: OP report, pg 6). Our traffic consultant, Mr Mehra, testified on cross-examination at the October 14, 2003, BZA hearing that a 55-unit apartment building would generate 14 morning peak hour trips, less than the number of morning peak hour trips generated by the increase in the Burke population that will drive to school under the application, whether the trips stem from children being dropped off in carpools or students and faculty driving to and parking at the school.

BZA
Case No. 17022
Exhibit No. 175
Board of Zoning Adjustment
District of Columbia
CASE NO. 17022
EXHIBIT NO. 175

Traffic Analysis

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- **Level of Service at two major intersections, and the overall congestion, will worsen under proposed TMP.**
- **DDOT's proposed no-left turn from Upton to Conn will increase the traffic on Upton St, Tilden St, 29th St, and in the Upton – Tilden alley.**

Traffic Analysis cont'd

- **The proposed TMP will have a detrimental effect on northbound Conn. Ave traffic during the morning drop-off period.**
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- **An alternate use of the land would have a smaller impact on traffic than the proposed application**