RE: BZA Application #17149

June 21, 2004

Mr. Geoffrey Griffis, Chair
Board of Zoning Adjustment
441 4th Street, Suite 210S
Washington, D.C. 20008

Dear Mr Griffis:

The Board will receive the District Department of Transportation. Report on the Sidwell application. The DDOT report does not provide the BZA with the information they need in the review of the Sidwell application for special exception. .

Before dealing with the specifics of DDOT report, there is a real issue of the differences between the actual DDOT report and representation of the DDOT findings in the OP Report. Please look at both these documents carefully.

With regard to the details of the DDOT report, there are inaccuracies, misinformation and faulty analysis in the DDOT Report which the BZA members should be aware of as they read the report. These items are covered below are in the order they appear.

Item 1. Current drop-off activity. In paragraph 2, the DDOT states the current drop-off activity is approximately 240 vehicles on 37th Street.

The next, run-on sentence is unclear. Is the 240 figure the drop off daily total or is it the total drop off and pick up This is a critically important data and should not be presented in such a confusing manner.

On page 2 of the Wells & Associates Sidwell Traffic Study, the consultants report there are 630 drop offs in the AM rush. When asked about number of drop offs on 37th Street, they said that approximately half the drop offs, or 315, were on 37th Street.

Using the Wells and Associates Traffic Study data, the afternoon pick up is 72 students during school dismissal and 61 at PM rush. This gives a total of 448 vehicle trips for AM and PM drop off and pick up. This figure also does not agree with the data provided by DDOT.

DDOT conducted its own study of 37th Street traffic in May, 2004. If there are differences in the data collected DDOT should present them to the BZA directly since it would bring into question the Sidwell Traffic Study data.

Item 2. Projected reduction. DDOT says eliminating 7th and 8th grader drop off on 37th Street would reduce "current daily total of approximately 240 to approximately 221

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vehicles- a reduction of about 19 vehicles even with increasing the current student cap to 850." The DDOT figure does not make sense.

According to the May 13, 2004 Memorandum to the Commissioners of ANC3C and ANC3F, an increase to 850 students would mean approximately 148 5th and 6th graders.

If Sidwell were to maintain the current drop off occupancy rate of 1.26 students, there would be 108 drop off vehicles in the AM, not 221 cited by DDOT.

If Sidwell were to comply with their Transportation Management Plan requiring all vehicles dropping off to be 2 student car pools, there would be a greater decrease in traffic. Thus, a reasonable projection is 1.75 5th and 6th grade students per vehicle. This translates into 85 vehicles for drop off on 37th Street, not 221 cited by DDOT.

Item 3. DDOT encouragements. In paragraph 4, DDOT "strongly encourages Sidwell" to increase mass transit utilization as well as stating that "Sidwell should also strive for higher vehicle occupancy rate".

If DDOT expects increase in transit and occupancy rates, they should state achievable goals, timeframe for achieving goals, monitoring mechanisms as well as penalties for non-achievement. Otherwise their recommendations are closer to "wish lists". DDOT should have observed: 1) there are no enforcement, monitoring, penalties or fines in the Sidwell TMP; and 2) with wide experience with other private schools, DDOT knows there will be no goal attainment without effective monitoring and enforcement.

If DDOT wants an increase in transit and vehicle occupancy, the agency should have called for a one year demonstration project with project construction approval and/or increase in enrollment contingent upon successful implementation.

Item 4. Additional parking to reduce impact on on-street parking. In the last paragraph, DDOT does not question the transportation management policy which Sidwell has adopted—to build a second parking level to accommodate student parking. This option chosen by Sidwell is the most expensive choice- providing on campus parking for student parking. Other, much less costly choices would have been to ban all student drivers (Field School), or utilization of a collection of traffic reduction strategies (such as Burke and GDS).

Item 5. DDOT recommendation on overflow parking adds problems. DDOT recommends a parking hierarchy which is another way of saying they support overflow parking for Sidwell students. The community and both ANCs are both opposed to overflow parking.

Prescribing that overflow parking should first go on to Quebec Street is bad policy.

- South side of the 3700 and 3600 block of Quebec (closest to Sidwell) are both residential, 2 hour reserved parking.

- There are very few if any parking spaces available in the 3700 and 3600 blocks of Quebec after 7:30 AM, when the Sidwell students arrive. The DDOT recommendation for using Quebec would mean students would be looking for parking in the 3500 block of Quebec, where there is parking only one side of the street in this residential block,.

- DDOT does not specify which blocks of Quebec Street should be used. A literal reading would have Sidwell students parking in the 3500 and 3400 blocks of Quebec or even further east. Quebec, narrow residential street, would be impacted by Sidwell student traffic.

- Parking on Quebec would exacerbate the unsafe intersection at Quebec and Wisconsin Avenue. In the Wells & Associates study, this intersection is ranked Level C in the AM rush and the PM school rush. In the PM rush, this intersection is Level F. Instead of loading more traffic on to this narrow residential street, DDOT should be working to ease such failing ratings at this intersection.

Item 6. 37th Street parking. In the last sentence DDOT states "This would limit school parking on 37th Street." This sounds as if it is a goal, a good thing to do. If this is the position of DDOT, they should back up their position a rationale as to why this is a goal. Between Quebec and Tilden on 37th Street is a non-residential street and therefore is preferred on street parking to Quebec Street..

Most importantly, the question of on-street parking should be dropped. The community and the ANCs have recommended no over flow parking by Sidwell. It is up to Sidwell to demonstrate that it can provide "ample parking" under Section 206.3 . If Sidwell can not meet the "ample parking" provision, it should have to return to the BZA for a review. DDOT pre-empting Sidwell from the "ample parking" provision is unacceptable.

DDOT should also withdraw it tacit endorsement of an enrollment cap of 850 students. Without the proposed garage and absent a one year demonstration project showing effective compliance with the TMP, DDOT is in no position to assess an enrollment cap from their transportation planning and policy perspective.

In conclusion, as with the OP Report to the BZA on the Sidwell Friends School application, the agency report is inadequate. The Board needs a high level of information and analysis to fully evaluate this application for special exception. We are very disappointed with the quality of the document present to the BZA by DDOT.

Cordially,

Barbara Beelar

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