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September 28, 2004

Mr. Geoffrey Griffis, Chair
DC Board of Zoning Adjustment
441 – 4th Street, N.W.
Washington, D.C. 20001

RE: BZA Case No. 17149, Sidwell Friends School

Dear Chairman Griffis and Board Members:

ANC 3F appreciates the opportunity to comment on responses received from DDOT. Attached are the ANC's comments, together with the original questions and responses from DDOT.

Sincerely,

Cathy Wiss

Cathy Wiss
Secretary, ANC 3F

One attachment

BZA
Case No. 17149
Exhibit No. 93

Board of Zoning Adjustment
District of Columbia
CASE NO. 17149
EXHIBIT NO. 93

ANC 3F COMMENTS ON DDOT RESPONSE OF SEPTEMBER 1, 2004 IN BZA CASE NO. 17149, SIDWELL FRIENDS SCHOOL

List 1 Questions

1. ANC 3F: Please list the date(s), time(s) of day, and location(s) where DDOT conducted onsite observations for its report on BZA Application No. 17149.
DDOT response: Onsite observations were conducted from 4/20/04 through 4/26/04 on 37th Streets between Quebec and Upton Streets, N.W. and on Wisconsin Avenue at the school driveway.

ANC 3F comment: Two of the 7 days observed, April 24 and April 25, were weekend days. April 26 was a faculty day at Sidwell when students were not in class. Thus, only four of the seven days of the study include data on traffic to Sidwell's middle school.

2. ANC 3F: Did DDOT observe traffic patterns during drop off and pick up of Sidwell students on 37th Street for this report?
DDOT response: Yes.

ANC 3F comment: Traffic patterns in front of the middle school, especially during drop off, are complicated and hazardous. Unfortunately, DDOT missed the opportunity to give insight into what is happening and how to make the situation better.

3. ANC 3F: Did DDOT conduct traffic volume counts on 37th Street for this report?
DDOT response: Traffic counts were conducted, not specifically for this report, but rather to determine zone data. The data is very similar to that collected by Wells and Associates who performed the transportation study for Sidwell.

ANC 3F comment: The counts for April 20-23 do show a very heavy volume of southbound traffic from 7:30-8:00 am, the time when the majority of students arrive at the middle school, but a lighter and more dispersed volume in the afternoon. This could be explained by varying dismissal times for classes, sports, and clubs, as well as the use of satellite pick up locations. This study may be the one requested by Barbara Beelar, as Chair of the Cleveland Park Citizens Association Task Force on 37th Street Traffic. Despite three requests from Barbara, DDOT never provided her the data or analysis.

The data supplied for turning motions for Tilden Street and the Washington Home driveway seem highly questionable. It is hard to believe that most of the traffic leaving the Washington Home parking lot would continue through to Tilden Street, a small neighborhood cul-de-sac, and most of the traffic leaving Tilden Street would drive into the Home's parking lot.

4. ANC3F: Did DDOT use any of the speed and traffic volume count data collected in 2003 for the Upton Street Traffic Calming Study, which included a collection point on 37th Street between Tilden and Upton Streets?

DDOT response: Yes, as stated in the Upton Street Traffic Calming study p. 5, traffic volume was counted and speed recorded at various locations during May-June 2003.

ANC 3F comment: The response suggests that DDOT did not use the speed and traffic volume data collected in the 2003 Upton Street Traffic Calming Study for DDOT's report on Sidwell, as there is no indication as to how or whether this data was used in analyzing the Sidwell application.

The result of the Upton Street Traffic Calming Study is that DDOT will be installing traffic circles at 37th and Upton Street, 38th and Upton Street, and a speed hump in the 3600 block of Upton Street. One of the major issues for residents of Upton Street has been the high volume of school traffic turning left from northbound Reno Road and speeding down the 3600 block of Upton Street to get to 37th Street. ANC 3F did not approve a "no left turn" sign for northbound Reno Road traffic at Upton Street, as requested by residents and proposed by the traffic consultants, because it would have been too restrictive.

5. ANC 3F: In developing its conclusions, did DDOT observe and consider satellite student drop-off and pick-up points, like the intersection of 37th and Upton Streets and the 3600 block of Tilden Street?
DDOT response: Yes, DDOT did consider alternatives for drop off and pick up activities including satellite locations. However, DDOT did not consider the intersection of 37th and Upton Street, or the 3600 block of Tilden Street as viable options, as the 3600 block of Tilden Street is a dead-end, and there is no sidewalk provided on 37th Street between Upton Street and the Sidwell middle school entrance.

ANC 3F comment: DDOT does not say what alternative drop off and pick up sites it did consider, only that it did not consider two places that are being used consistently. Drop off and pick up activities do take place at 37th and Upton Street and on Tilden Street east of 37th Street, as ANC 3F and the community have testified. Residents state that this fall between 12 and 24 students are being picked up at these unmonitored locations daily. Commissioner Wiss observed the same thing last spring. The 37th and Upton Street satellite pick up site is shown in the January 2004 Wells Traffic Impact Study (February 13, 2004, Application for Special Exception, Tab D, page 14).

6. ANC 3F: If so, what are DDOT conclusions about the effect of using these locations on traffic operations and safety of these intersections and streets, both for students and others traveling through the area?
DDOT response: There is no sidewalk on 37th Street between the Washington Home site, located immediately north of the Sidwell campus, and Upton Street, so students would be walking in the street, which is unsafe. Tilden Street, which is aligned with the Washington Home driveway, is a dead end road.

ANC 3F comment: DDOT provides two more reasons why the satellite pick up sites at these locations are poor choices, unsafe, and should be discontinued. DDOT failed to

observe or to address the impact of these pick up sites on traffic on 37th Street in front of the middle school or on the residential streets where they are occurring.

7. ANC 3F: Did DDOT consider the impact of shifting the proposed 37th Street middle school entrance closer to the driveway of The Washington Home, which will be used not only for deliveries but also for all Washington Home employee traffic (with 97 employee parking spaces and changes of employee shifts during Sidwell's drop-off and pick-up times), as approved in BZA Application No. 16836?
DDOT response: Based on the BZA application 16836 and materials DDOT reviewed for the site, DDOT did not consider impacts between the Washington Home driveway and the location of the current entrance on 37th Street, which will not change and is not of the application.

ANC 3F comment: There is considerable interaction between the 37th Street entrance to the Washington Home and the entrance for Sidwell. Nursing staff shifts change between 7:00-7:30 am and other staff members arrive between 7:30-9:00 am. Deliveries are also made at this time. The afternoon nursing shift changes between 3:00-3:30 pm and a number of employees leave via the 37th driveway. The non-nursing staff shift ends at 3:30 so there is a continuation of departure of Home employees from this driveway during all Sidwell and Hearst pick up pm peak time. The BZA has approved expansion of the Washington Home parking lot to 130 spaces. Use of the Home's 37th Street driveway will increase because it will become the entrance to the employee section of the parking lot and will continue to be used by delivery trucks and ambulances. Commissioner Wiss has observed conflicts between the Sidwell queue and cars and trucks attempting to use the Washington Home driveway.

DDOT is mistaken that there will be no change in the location of the entrance to the Middle School. If the special exception is granted, the middle school entrance will be shifted to the north, to within a few car lengths of the Washington Home driveway. There will be fewer spots for queuing between the driveway and the proposed entrance. Although Sidwell plans to provide queuing space south of the entrance, parents typically stop to let out students opposite the entrance rather than continuing farther down the street. In sum, DDOT has not addressed the problems that will be caused by this change in entrance location.

8. ANC 3F question: Did DDOT consider the effect of shifting all Sidwell traffic to the Wisconsin Avenue entrance?
DDOT response: DDOT concluded that the drop off for 5th and 6th graders would be a better option. Adding traffic to Wisconsin Avenue will increase commuter cut through traffic; the proposed reduction by limiting drop off to 5th and 6th grade will have a positive impact of 37th Street.

ANC 3F comment: DDOT's only support for its conclusion that use of 37th Street for 5th and 6th graders would be better than having all students use the Wisconsin Avenue entrance is the unexplained assertion that "adding traffic to Wisconsin Avenue will increase commuter cut through traffic". DDOT ignores the fact that the neighborhood to

the north of Sidwell currently experiences significant traffic generated by Sidwell's middle school drop off and pick up on 37th Street. The number and concentration of commuters choosing to leave Wisconsin Avenue to wind through local streets could hardly equal the number or intensity of cars drawn to 37th Street by Sidwell's middle school entrance, even if drop off is limited to 5th and 6th grade students. Commuters who feel tempted to cut through neighborhood streets will have to contend with the traffic calming devices being installed on Upton Street. Southbound Wisconsin Avenue has a "no left turn" sign at Upton Street to further discourage cut through commuter traffic.

9. *ANC 3F: Has DDOT reviewed the Wisconsin Avenue entrance to determine whether it has, or could be designed to have, the capacity to accommodate all student drop-off and pick-up traffic?*
DDOT response: No, see answer to question 8.

ANC 3F comment: DDOT again misses an opportunity to analyze the situation fully enough to determine the best course of action.

10. ANC 3F: How many unrestricted parking spaces are available in the neighborhood?
DDOT response: 149 unrestricted parking spaces
11. ANC 3F: What are the locations of these unrestricted spaces?
DDOT response: See attachment.

ANC 3F comment: On September 27, 2004, ANC 3F counted parking spaces on the streets listed in DDOT's 8/27/04 "Sidwell Friends School - Area Parking Survey". The ANC's survey, which was based on the number of cars actually parked on these streets in legal parking spaces, shows that DDOT overestimated the number of parking spaces available by about 15 spaces. The exact number is illusive because of missing "no parking" signs on Idaho Avenue.

12. ANC 3F: Did DDOT make any observations about the use of these unrestricted spaces? If so, what were they?
DDOT response: Upon observation on numerous site visits (both formal and informal), DDOT concluded that the spaces are rarely filled to capacity. In fact full capacity was never observed during these site visits.

ANC 3F comment: Unfortunately, DDOT did not specify the dates and times of day observations were made, as use of these parking spaces may vary. On September 27, 2004 at 1:00 pm, only the 3700 block of Idaho Avenue was not parked to capacity. ANC 3F's observation corresponds to statements ANC 3F has received from residents that by mid-morning no unrestricted parking spaces are available. Commissioner Wiss has verified neighborhood observations that many of the parking spaces are, in fact, taken by 7:00 am. Perhaps DDOT made its observations in May or June, when many Sidwell juniors and seniors come to campus less frequently because of exams and special projects, or during the summer when Sidwell is not in session and many employees and visitors to nearby businesses are on vacation.

The DDOT study also does not deal with the fact that under Section 206.3 Sidwell is required to provide ample parking for all, including students.

List 2 Questions

1. ANC 3F: How many times did DDOT meet with Sidwell officials and /or the Sidwell Traffic Consultant, Wells & Associates?
DDOT response: DDOT, as a general practice, is willing to meet with any and all concerned groups upon request. DDOT met with Sidwell on 10/10, 1/15, 3/11, and 5/11. The meetings with the community were held on 12/3 and 12/10. In addition, DDOT met internally to discuss this case on 2/26, 3/17, and 5/7. DDOT also communicated with community and school representatives through email and phone conversations.

ANC 3F comment: The meeting on December 10 was called by the Cleveland Park Citizens Association Task Force on 37th Street Traffic and attended by ANC commissioners, institutional representatives, and residents. Colleen Hawkinson of DDOT attended and made a brief presentation.

Neither the ANC nor community members are aware of a meeting on December 3. Perhaps DDOT is referring to a November 19 meeting between Ken Laden, Colleen Hawkinson, Commissioner Wiss, and residents living north of Upton Street who are concerned that traffic calming devices on Upton Street could push more traffic onto their streets. One resident of the 3600 block of Van Ness Street spoke about the impact of school traffic on her block.

A meeting DDOT did not list took place on January 12, 2004, when Colleen Hawkinson came to view Sidwell morning traffic with residents. Later the community learned from Sidwell that traffic on January 12 was atypical because seniors, many of whom drive, did not attend school that day. Barbara Beelar informed Colleen Hawkinson of this, but is unaware whether Ms. Hawkinson ever adjusted her observations or returned to observe morning or afternoon Sidwell traffic at some other time.

2. ANC 3F: Please list all streets surrounding Sidwell and indicate their official DDOT classification; i.e., residential, commercial?
DDOT response: The streets surrounding Sidwell are as follows: Wisconsin Avenue (principal arterial), 37th Street (local), Upton Street (local), Quebec Street (local), and Tilden Street (local).

ANC 3F comment: The streets used to access the middle school entrance on 37th Street are all local streets. Usually destinations generating high traffic volumes like Sidwell route traffic onto arterial streets because of the arterials' capacity to handle the volume. High traffic volume, especially when it is compressed into a short time period, is not appropriate for local residential streets. Unlike Sidwell, Hearst School does not have access to an arterial to accommodate school traffic.

3. ANC 3F: How many times did DDOT meet with the residents of the affected area and/or attend the ANC 3C or ANC 3F meetings to hear resident concerns regarding traffic and safety on 37th Street or these neighboring streets? Who from DDOT attended the meeting(s)?
DDOT response: See answer to question 1.

ANC 3F comment: See comment above.

4. ANC 3F: Is DDOT aware that at the request of ANC 3F, the Second District Police were monitoring and enforcing parent pick-up and drop-off at Sidwell? Did DDOT consult with the Second District police before making its traffic recommendation?
DDOT response: No, DDOT was not aware that ANC 3F requested MOD to monitor pick-up and drop-off.

ANC 3F comment: DC agencies should coordinate their work more effectively. MPD could have told DDOT of specific concerns that could have been addressed during this application process. Information about traffic and speeding violations from the police could help DDOT and Sidwell understand the dynamics of drop off and pick up on 37th Street.

5. ANC 3F: At the request of residents and the ANC, DDOT was performing a traffic survey and traffic counts on 37th Street between Upton Street and Quebec Street. It is our understanding from a DDOT letter that Wanda Pinn-Mills was overseeing the traffic counts and that they were to be completed before the end of the school year to ensure accurate counts. Has the study been completed? What were the results? Please provide a copy of the study.
DDOT response: DDOT conducted its own survey of 37th traffic in May 2004. However, the data collected by DDOT showed no major discrepancies between our data and that the data found in the Sidwell Friends School Transportation Study. On one Monday when DDOT was collecting data, school was not in session. During this day, there was a decrease in vehicular traffic on 37th Street, however, the vehicular traffic when school is in session still falls well within the capacity that a local road has been designed to carry.

ANC 3F comment: The response is confusing. In responses given above, DDOT mentions a traffic survey from April 20-26, 2004, and supplies counts. Here, DDOT speaks of a survey in May. Was more than one survey conducted? If so, results of the May survey should have been provided. Because of changes in class schedules during May, a survey that month may have been atypical.

6. ANC 3F: Who from DDOT monitored parent pickup and drop-off activity at Sidwell? What were their conclusions regarding the operation? Did they make a written and/or verbal report for improving the operation?
DDOT response: Colleen Hawkinson, Lewis Booker, and Abdoulaye Bah monitored pick-up and drop-off activity, at times together, individually and with the community. Their observations and conclusions were included in the DDOT report to the BZA.

ANC 3F comment: The only time ANC 3F knows that DDOT monitored pick up and drop off activity is January 12, as discussed under question 1. The conclusions may have been included in the DDOT report to the BZA, but not the observations.

7. ANC 3F: DDOT is planning on making significant changes to Upton Street, including the addition of two traffic circles, no left turn onto street, and speed bumps, to address residential complaints about cut-through traffic, speeding traffic, etc. How will this affect other residential streets in the vicinity of Sidwell in regard to how Sidwell parents will access 37th Street? Were these changes taken into account when DDOT prepared its report?
DDOT response: The traffic calming measures will cut down on speed, increasing safety for both the residents and students. DDOT has planned on conducting a follow-up study 6 months after implementation to determine diversion rates. In addition, there will NOT be a prohibition on right hand turns from Reno Road onto Upton Street.

ANC 3F comment: Residents of streets to the north of Sidwell are concerned that when traffic calming devices are installed on Upton Street, the devices will divert traffic -- including that traveling to and from Sidwell -- onto their blocks. These residents already complain about Sidwell parents speeding on their blocks, as Commissioner Wiss testified at the hearing. DDOT has now collected baseline data at four additional locations in the neighborhood as part of the traffic calming effort.

8. ANC 3F: DDOT agreed to do traffic counts at the intersections of streets near Upton Street in response to resident complaints regarding traffic volume and vehicular safety. Have those counts been completed? What recommendations is DDOT proposing? Please attach report. How will the recommendations affect 37th Street? Were these recommendations taken into account when DDOT prepared its report on Sidwell?
DDOT response: See answer to question 5.

ANC 3F comment: ANC 3F has learned that the counts have been completed, but has not received a report. Locations where counts were taken include the 3600 block of Van Ness Street, the 3700 block of Veazey Street, 37th Street between Upton and Van Ness Streets, and 38th Street between Upton and Van Ness Streets. It is unclear from DDOT's response whether this information was used for the Sidwell analysis.

9. ANC 3F: Sidwell is proposing to move the 37th Street entrance from the middle of the block to directly across from the entrance to Hearst Elementary School. Did DDOT consider the effect of this change on traffic coming to Hearst Elementary School?
DDOT response: Sidwell will not be moving the 37th Street entrance based on the BZA application and information DDOT has reviewed.

ANC 3F comment: Sidwell will be moving the entrance to the middle school, but ANC 3F has now learned that the operational entrance to Hearst Elementary School is in the back of the building. Thus, students walk down the HES driveway to the back of the building. This driveway is currently directly across the street from the entrance to the Sidwell Middle School.

10. ANC 3F: Has DDOT considered the impact of the new entrance on the operation of traffic entering and leaving the 3500 and 3600 blocks Tilden Street and the 3900 block of Idaho Avenue?
DDOT response: See answer to question 9.

ANC 3F comment: Apparently DDOT has not considered the impact of moving the entrance on traffic entering and leaving the 3500 and 3600 blocks Tilden Street and the 3900 block of Idaho Avenue.

11. ANC 3F: ANC 3F strongly approves of DDOT's encouragement of Sidwell increasing the use of mass transit. What means does DDOT suggest to accomplish this?
DDOT response: DDOT expects the school to take appropriate measures to encourage mass transit usage.

ANC 3F comment: ANC 3F appreciates DDOT's support of increased use of mass transit, but would have preferred more guidance on how to accomplish it.

12. ANC 3F: DDOT is proposing in their report that should the Sidwell parking garage fill up, that students should park on Quebec Street. Has DDOT talked to the residents of Quebec Street about this recommendation to find out their views?
DDOT response: DDOT in its supplemental report states that unrestricted parking is open to all, and a large number of unrestricted parking spaces are located on 37th Street and Quebec Street, adjacent to the Sidwell campus. Sidwell and the neighbors may come to an agreement regarding use of those unrestricted parking spaces. DDOT has not discussed this matter with the residents of Quebec Street, however, as stated above, existing curbside parking regulations currently allow unrestricted parking.

ANC 3F comment: Although the 3700 block of Quebec Street has unrestricted parking spaces, it also has some spaces restricted to two hours or residential parking permits. Residents of this block complain of Sidwell students parking in the restricted spaces. Usually, Fannie Mae consultants take the unrestricted spaces by 7:00 am, before Sidwell students arrive. A better approach would be for DDOT to drop its recommendation that Sidwell students use this block for overflow parking, rather than suggesting that Sidwell and residents come to a private agreement on how these public parking spaces should be used. Indeed, ANC 3F maintains its position that Section 206.3 requires Sidwell to provide ample parking for all students on campus.