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November 8, 2005

Allison C. Prince
Phone: 202.663.8053
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NOV - 8 PM 2:35

D.C. OFFICE OF ZONING

RECEIVED

Hand Delivered

D.C. Board of Zoning Adjustment
Suite 210
441 4th Street, N.W.
Washington, DC 20001

**Re: BZA Application No. 17383 - The Lab School of Washington
Prehearing Statement of the Applicant**

Dear Chairman Griffis and Members of the Board:

Enclosed please find the pre-hearing statement of St. Patrick's Episcopal Day School, the applicant in the above-mentioned BZA application. The applicant looks forward to presenting its case to the Board at the public hearing on November 22, 2005.

Sincerely,

Allison C. Prince

Ashleigh D. Horne

Enclosures

cc: ANC 3D06 – by hand
Office of Planning – by hand
Peter Braun – by hand

BOARD OF ZONING ADJUSTMENT
District of Columbia
CASE NO. 17383
EXHIBIT NO. 25

400080314v1

Board of Zoning Adjustment
District of Columbia
CASE NO. 17383
EXHIBIT NO. 25A1

THE LAB SCHOOL OF WASHINGTON

BZA APPLICATION NO. 17383

RECEIVED

D.C. OFFICE OF ZONING

2005 NOV - 8 PM 2: 36

Pre-hearing statement

**BEFORE THE BOARD OF ZONING ADJUSTMENT
OF THE DISTRICT OF COLUMBIA**

**Application of The Lab School of
Washington**

**BZA Application No. 17383
ANC 3D**

2005 NOV - 8 PM 2: 35

D.C. OFFICE OF ZONING

RECEIVED

STATEMENT OF THE APPLICANT

**I.
INTRODUCTION**

The Lab School of Washington (the “School”) is a private school for children with special needs located at the intersection of Reservoir Road and Whitehaven Parkway. Because it serves children with learning and other disabilities, the students at the School require more individual attention than is offered by typical private schools. As a result, the number of teachers and staff employed by the School has gradually increased over time. The School currently employs a greater number of faculty and staff than permitted under its most recent approval by the Board and has a slightly larger student enrollment. As a result of the increased number of faculty and staff, the parking currently available on the property does not meet the minimum parking requirements of the Zoning Regulations. There is extremely limited space on the Property for additional parking. The Lab School has investigated the possibility of constructing a parking garage on its campus, but the only available spaces are either the site of a protected wetland or the front of the Property adjacent to single family homes. After studying several scenarios and working with the community, the School proposes to increase the parking available for employees and visitors of the Lab School by installing 50 back-in, angled parking spaces with wheel stops and a designated sidewalk within the existing public right-of-way of

Whitehaven Parkway.¹ The School is requesting that these spaces count toward its parking requirement for a term of five years, which will give the School time to acquire additional property and develop plans for a new parking garage or to find a more permanent solution to its parking needs. This application requests a special exception in order to bring the School into compliance with its faculty/staff and student enrollment caps as well as the parking requirements.

In addition, the School recently purchased property located across Whitehaven Parkway from the School. The property is improved with a single-family home. The School requests special exception approval to use the property as administrative offices for the School and for two additional parking spaces.

II.

NATURE OF RELIEF SOUGHT

The Lab School requests that the BZA approve a special exception under 11 DCMR § 206 to permit an increase in the faculty and staff cap from 95 to 182 for an existing private school, located at 4759 Reservoir Road, N.W. (Square 1372, Lot 25) (the “**Property**”), in the R-1-B Zone District. The School also is requesting a minor student enrollment increase from 310 to 330. The School further requests a special exception under 11 DCMR § 214 to permit the location of accessory parking spaces for the School off-site. The School is requesting that its use of the parking spaces be approved for a term of five years. Finally, the School requests special exception approval under 11 DCMR § 206 to use the property it recently acquired as an administrative building. The property is located across Whitehaven Parkway from the Property at 4749 Whitehaven Parkway, N.W. (Square 1374, Lot 840) (the “**New Property**”).

¹ The use of this public space will require a public space permit and entail annual rental payments to the District of Columbia.

III. **BACKGROUND**

A. The Lab School of Washington

The Lab School of Washington (the “**School**”) is a private school for children with special needs. It has been located at the Property since the School acquired it in 1982. The School currently enrolls 330 students in grades kindergarten through 12 and also offers educational programs for adults. The School now employs 182 faculty and staff.

B. The Lab School Mission

Founded in 1967 by Sally L. Smith, The Lab School of Washington is internationally recognized for its innovative programs for children and adults with learning disabilities. The Lab School Day School offers individual instruction to students in kindergarten through the 12th grade.

The instructional approaches developed by Professor Smith, who is head of the Graduate Program in Special Education Learning Disabilities at American University as well as the Director of the Lab School, emphasize hands-on, experimental learning and the use of the arts to teach academic skills. State-of-the art work with computers, storytelling, writing, and art in the elementary school as well as a continual emphasis on project learning in the junior and senior high school keep the Lab School pioneering new educational methods. Over 90% of Lab School students go on to college.

Because of the special needs of the students, the Lab School provides specialized services to its students, including: individualized tutoring for all ages; psychological assessment; psychotherapy; occupational therapy, evaluation and treatment; and consultation services. The Lab School outreach service offers assistance to parents and professionals. In some classes, such as reading, Lab School students require one-on-one instruction by teachers.

The Lab School Night School, founded in 1984, has helped adults soar academically as they enter or re-enter college, pass the GED, or upgrade their employment skills. In addition, many adults with learning disabilities are not working in jobs that build on their strengths and interests. Lab School Career Counseling helps these individuals. A number can go on to college with the help of The Lab School of Washington's College Counseling services.

The Lab School has been an active member of the community for over 20 years. Since its new athletic building was approved in 1997, the School has offered the Community Swim Program, which allows neighborhood residents the use of the Lab School's indoor pool and gym. The School also hosts local swim teams and swim clubs and provides space for swimming lessons. The School offers basketball training to neighborhood children and frequently hosts basketball themed birthday parties for children on the weekends. The School also sponsors community oriented events such as Halloween festivities and African heritage events as well as participating in extensive community service.

C. Previous Zoning Approvals

The School was established at its present location in 1982. Prior to that time, the Property was the location of the Florence Crittendon Home and School. In 1992, the BZA, by Order No. 15642, granted the School's application to add additional property to the School and to convert a single family home into administrative offices. In the 1997 case that approved the new gymnasium (Order No. 16273), the BZA approved a maximum student enrollment of 310 students and a faculty/staff cap of 95.

IV.
DESCRIPTION OF PROPERTY AND PROPOSED USE

A. Subject Property and Environs

The Property is located in the R-1-B Zone District near the intersection of Whitehaven Parkway and Reservoir Road. It has frontage on both streets. The Property contains 163,567 square feet of land area. It is improved with a prominent “castle” administration building, a gymnasium, a carriage house, an arts building, two classroom buildings, and two houses. There currently are 87 legal parking spaces located on the Property, but the Property can accommodate 107 cars. The New Property is located across Whitehaven Parkway from the Property. It contains 5,003 square feet of land area and is improved with a single family home. The New Property will contain two parking spaces on its property. Because most of the front yard of the New Property, as well as the driveway, are located in public space, the School may seek a public space permit in order to park in the driveway as well.

The surrounding area is characterized by a mixture of residential and institutional uses. The Property abuts St. Patrick’s Episcopal Day School to the east and Fire Engine House No. 29 to the west. Both sides of Reservoir Road, located south and east of the Property are devoted primarily to use as single family homes. The Embassy of the Federal Republic of Germany and an underground reservoir are located further east of the Property. St. Patrick’s Episcopal Day School gymnasium, The George Washington University’s Mount Vernon Campus, and the Our Lady of Victory Church and School are located across Whitehaven Parkway from the School. The New Property is adjacent to two single-family homes, both of which are owned by St. Patrick’s School.

B. Proposed Faculty and Staff Increase

The School proposes to increase its permitted number of faculty and staff employees from 95 to 182 to reflect current conditions at the School. Although student enrollment has remained relatively stable since its last approval in 1997, the number of faculty and staff has gradually increased. This is a result of the School's very low student to teacher ratio (two students per one teacher) and the School's need to hire resource teachers and professionals to assist with the special needs of learning disabled students. Indeed, some reading classes require one teacher per student. The individualized attention the students receive is demonstrated in the classroom photographs attached as Exhibit A. The resource teachers and professionals include tutors, psychologists, occupational therapists, speech therapists, and other professionals. The faculty and staff ratio is critical for the Lab School to achieve its educational mission for the learning disabled.

In addition to faculty and staff, approximately 22 additional individuals are on the Property for some portion of the day. This includes 8 student teachers from American University and 14 tutor trainees.

Although the School employs a total of 182 faculty and staff, this number represents a total headcount. Many of the resource teachers, professionals, student teachers and tutor trainees are on the property for one, two, or three days per week.

C. Proposed Student Enrollment Increase

As set forth above, the School has a current student enrollment of 330 students. BZA Order No. 16273 permits a maximum student enrollment of 310. The Applicant requests that its enrollment cap be increased an additional 20 students in order to reflect current conditions.

D. Proposed Angled Parking Spaces in Public Space

The Property currently provides 87 on-site parking spaces. The School proposes to install 50 back-in angled parking spaces with wheel stops with a designated sidewalk within the existing public right-of-way of Whitehaven Parkway. Two of the parking spaces will be handicapped accessible. As shown in the photographs attached as Exhibit B, the condition of the public right-of-way along Whitehaven Parkway is in need of improvement. The terrain is frequently muddy and the pavement is uneven. There is no sidewalk on either side of Whitehaven Parkway at this location. There is no stormwater management system. Although there are a few mature trees located in this public space, in general the landscape is overgrown with brush, vines, and weeds. If the parking spaces are approved, the School will retain the mature trees. A plan showing existing conditions of the site is attached as Exhibit C. The proposed back-in, angled parking spaces will drastically improve both pedestrian safety and the aesthetics of this area.

Just north of the Property, St. Patrick's Episcopal Day School has installed similar spaces along Whitehaven Avenue. As the photographs attached as Exhibit D demonstrate, the area is safer and more attractive. The parking spaces are amply sized and safely set back from the travel lanes. The new curbs provide an attractive and uniform appearance and the landscaping is well-maintained. The new sidewalk enhances pedestrian safety by providing a curb and ample walking space set back from the travel lanes. To increase pedestrian safety, the sidewalk is separated from the parking spaces by a five foot planting strip.

The School would like to install 50 back-in angled spaces on the south side of Whitehaven Parkway, N.W., between Reservoir Road and the entrance driveway to the School. The School plans to install a five-foot wide planting strip between the parking spaces and the adjacent properties. The planting strip will be landscaped with new trees and other appropriate

vegetation. The School also plans to install a new, six-foot wide sidewalk adjacent to the planting strip. An updated site plan for the proposed angled parking spaces is attached to this prehearing statement as Exhibit E (the “**Plan**”). As shown on the Plan, the School intends to retain the healthy mature trees located in the area of the parking spaces. During discussions between the School ANC 3D, the ANC indicated that it has concerns about safety and would like the School to eliminate the two spaces closest to the Reservoir Road intersection. The School would be willing to eliminate those two spaces if the Board or DDOT decides their removal will improve safety. The ANC also requested that one parking space be set aside for Fire Engine House No. 29 for ambulance access. The School is willing to set aside this space. However, the property owned by Fire Engine House No. 29 has no frontage on Whitehaven Parkway, and the Fire department would be required to traverse property owned by PEPCO in order to access the space. The School has contacted Fire Engine House No. 29 about the proposed parking spaces and they indicated no opposition to them.

Although these parking spaces will benefit The Lab School, they will benefit the community as well. The parking spaces will be reserved for use by the Lab School between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, but they will be available for use by residents during evenings and weekends. The School decided to provide a sidewalk in the Plan at the request of former ANC Chairman John Finney of ANC 3D. This sidewalk will greatly improve pedestrian safety by reducing the potential for conflicts between vehicles and pedestrians. The sidewalk will be available for use by the general public and will improve safety for all residents of the neighborhood who walk on Whitehaven Parkway.

The installation of the proposed angled, back-in parking spaces will remove approximately 13 public parking spaces that were available to individuals with a Ward 3 parking

sticker. The removal of these parking spaces will have little effect on residential neighbors because this area of Whitehaven is characterized by predominately institutional uses. The public parking spaces on the opposite side of Whitehaven Parkway will remain available for use by Ward 3 residents.

Prior to submitting this application, the School asked DDOT to review the proposed spaces. The School incorporated changes requested by DDOT into the design. In a memorandum dated February 18, 2005, DDOT determined that the proposed spaces are technically acceptable. The memorandum is attached as Exhibit F.

E. Proposed Use of the New Property

The School recently purchased the New Property, which is located at 4749 Whitehaven Parkway N.W. It comprises 5,003 square feet of land area, and is improved with a single family home. The School plans to use the New Property as administrative offices for the School. The School is not proposing to use the New Property for classrooms. Approximately 15 existing employees will have offices at the New Property and there will be two parking spaces. The School may seek a public space permit to permit faculty and staff using the building to park in the driveway.

**V.
COMMUNITY OUTREACH**

This application is the result of the School's discussions with the community. During 2004, ANC 3D expressed concern about whether the School provides sufficient parking for its employees and whether the School was in compliance with its faculty and staff cap. Since then, the School has had numerous discussions and meetings with ANC 3D and various neighbors. Following these communications, the School determined that it had incorrectly excluded tutors,

interns, and other specialists from the faculty and staff count. Given the increased faculty and staff numbers, the School also needs to provide more parking.

During the last year, the School has worked with the ANC and the District of Columbia Department of Transportation to select and develop a plan from the twelve options presented, finally selecting the plan presented in this application as the only feasible way for the School to come into compliance with its cap and to provide more parking for its employees. The School worked with John Finney, former Chairman of ANC 3D, in preparing this application and the plan for the angled parking spaces. In response to Mr. Finney's comments, the School included a new sidewalk in the Plan. Unfortunately, while in the process of preparing the plans and this application, Mr. Finney passed away.

One of the alternatives, to construct a parking garage on the Property, would cause major disruption and inconvenience to the easternmost and southernmost abutting properties and would require two to three years for fund raising. That alternative would temporarily displace approximately 48 parking spaces, bus pick-up, and bus delivery to the street during a two year construction period of a parking structure.

The School has presented the plan for the angled parking spaces to the ANC, DDOT, and the School's institutional neighbors. The School met with ANC 3D during its regularly scheduled meetings in September, October, and November. In April of 2004, the Lab School obtained a letter of support for the Plan from St. Patrick's Episcopal Day School. A copy is attached as Exhibit G.

VI.
THE APPLICANT IS ENTITLED TO SPECIAL EXCEPTION RELIEF
UNDER THE ZONING REGULATIONS

Uses permitted by special exception are deemed compatible with other uses permitted in that particular zoning classification provided certain requirements are met. Schools are recognized as reasonable and appropriate uses in the residential zone – “In general, uses of land for educational purposes are ‘highly favored,’” Glenbrook Road Ass’n v. D.C. Board of Zoning Adjustment, 605 A.2d 22 (D.C. 1992). Also, in reviewing applications for a special exception under the Zoning Regulations, the Board’s discretion is limited to determining whether the proposed exception satisfies the relevant zoning requirements. If the requirements are satisfied, the Board ordinarily must grant the application. *See, e.g., Nat’l Cathedral Neighborhood Ass’n v. D.C. Board of Zoning Adjustment*, 753 A.2d 984, 986 n.1 (D.C. 2000). As set forth in greater detail below, approval of special exception relief in this case is in harmony with the general purpose and intent of the Zoning Regulations and will not adversely affect the use of nearby properties.

VII.
THE APPLICANT MEETS THE STANDARDS FOR A FACULTY/STAFF AND
MINOR STUDENT ENROLLMENT INCREASE
AND FOR USE OF THE NEW PROPERTY FOR A PRIVATE SCHOOL

Section 206 of the Zoning Regulations provides that a private school shall be permitted in the R-1-B Zone District if the BZA finds two requirements are met. First, the private school must not be objectionable to adjoining and nearby property because of noise, traffic, number of students or otherwise objectionable conditions (11 DCMR § 206.2). Second, ample parking, but not less than that required under Chapter 21 of the Zoning Regulations, must be provided to accommodate the students, teachers, and visitors likely to come to the site by automobile (11 DCMR § 206.3). Under Chapter 2100 of the Zoning Regulations, the School is required to

provide two spaces for every three teachers and other employees. In addition, for the portion of the School devoted to high school use (1/4 of the school), the School is required to provide one parking space for every ten seats in the gymnasium. The School's gymnasium seats 300.

Through previous applications approved by the BZA, the School has demonstrated that its programs meet these standards. The increase in faculty and staff, together with the additional parking spaces, will allow the School to provide its students the special services they need without substantially affecting the conditions upon which the previous approvals were granted. The requested student enrollment increase is minor and reflects the current conditions at the School.

A. The Use Is Not Likely to Become Objectionable to Nearby Property Because of Noise, Traffic, Number of Students or Otherwise Objectionable Conditions

1. Noise

The additional faculty and staff do not cause objectionable noise and have little effect on neighboring properties. The faculty and staff generally work inside the school buildings, and as a result, cause no adverse noise impacts. Most of the School's immediate neighbors are institutional uses, and the School's buildings are well-buffered from nearby residential properties. Likewise, the requested minor increase in student enrollment will have little effect. The School proposes an increase of only 20 students. The increase in faculty and staff from 95 to 182 will have little impact on noise. The teachers and staff generally spend all their time inside the school building.

The use of the New Property as an administrative building for the School will not cause objectionable noise impacts to neighboring property. The New Property abuts St. Patrick's Episcopal Day School gymnasium, The George Washington University's Mount Vernon Campus, and two single family homes owned by St. Patrick's. The New Property will not be

used as classrooms for students, thereby limiting any noise emanating from the site. Because the building will be used as administrative offices, most of the activity related to that use will take place indoors.

2. Traffic

The School currently operates with a faculty and staff of 182 without significant adverse effects on traffic. Pursuant to BZA Order No. 16273, the Reservoir Road entrance to the site has been realigned with the MacArthur Boulevard intersection in order to take advantage of the traffic signal at that location. The Whitehaven Parkway entrance has been closed. These changes have significantly improved the traffic circulation patterns near the site since the 1997 application.

The transportation consulting firm of Wells and Associates has undertaken traffic study of the area in which the Property is located and has completed a Traffic Impact Analysis of the conditions of the School (Exhibit H, “**Traffic Study**”). It demonstrates that the additional faculty and staff do not adversely affect traffic patterns in the vicinity of the site or have an adverse impact on the road network. The Traffic Study measured the effect of the existing enrollment (330) and faculty/staff numbers (182) and compared it to the approved enrollment (310) and faculty/staff cap (95). The Traffic Study finds that reducing the enrollment and number of faculty and staff would decrease the average delays per vehicle at the MacArthur Boulevard/Whitehaven Parkway intersection by only 2 seconds during the AM peak hour and would have virtually no effect during the PM peak hour. This intersection currently operates at a Level of Service “F” during the AM peak hour. This reduced level of service is attributable primarily to commuter traffic. (Exhibit H, p. 8). The Traffic Study concludes “[t]hese small reduced delays would not change existing peak hour levels of service. ... These small reduced

delays are well within the range of delays currently experienced during weekday peak hours along MacArthur Boulevard and would not be perceptible to the average motorist.”

In addition, the School has taken steps to mitigate traffic impacts. The School maintains a carpool list and encourages faculty, staff, therapists, volunteers, and others to voluntarily form carpools. The School currently reimburses three faculty and staff for parking spaces they lease from the nearby Safeway. The School recently purchased a shuttle bus that provides service between the School, the American University Campus, and the Tenlytown Metro. Between 12 and 18 individuals ride the shuttle bus each day. Information about the shuttle bus is attached as Exhibit I. The School encourages bicycle use by providing bicycle racks and changing rooms with showers and lockers. The High School has implemented a new policy whereby only students with a demonstrated hardship and administration approval may drive to school. Demonstrated hardship includes students with parents who are ill and students who travel a great distance to school, such as from Annapolis, Maryland. At this time, five students have approval to drive to School.

The use of the New Property as administrative offices for the School will have a negligible effect on traffic. Only approximately 15 of the existing school employees will use the New Property on a regular basis. There will be no special events held at the New Property.

3. Number of Students

While the School generally has maintained a stable student enrollment that is within the cap established by the BZA in 1997, the current enrollment now exceeds the cap by 20 students. As set forth above, the Property is large and buffered from residential uses. It can easily accommodate 20 additional students.

In addition, due to the special needs of the students, the School had found that it must employ more teachers and resource professionals in order to complete its educational mission.

The School currently employs 182 faculty and staff. The additional faculty and staff will not have an objectionable impact on neighboring property because they will have little impact on noise, will not substantially affect traffic and will not cause other objectionable conditions. The School plans make more parking available for the additional faculty and staff and has taken steps to reduce traffic and parking demands. The school reimburses three teachers who lease parking spaces off-site, and the School has purchased a shuttle bus to encourage use of public transportation. The use of the New Property will not cause any additional increase in faculty and staff or students.

B. Ample Parking

During the course of discussions with the community, it became clear to the School that the neighbors' primary concern was with overflow parking in the neighborhood from the School. In addition, the School discovered that it does not provide sufficient parking to meet the requirements of the Zoning Regulations.

The School currently provides 87 spaces on the Property and will provide two on the New Property. Under § 2100 of the Zoning Regulations, the School is required to provide 130 parking spaces. Because the School serves grades kindergarten through 12, the parking requirement for the School must be calculated in increments. Under § 2100, a private school is required to provide two parking spaces for every three employees at the time when the maximum number of employees are on the Property. For 182 employees, this results in 122 spaces. In addition, for the high school use, the School is required to provide one space for each ten seats in the gym. The gym has the capacity for 300 occupants. Because the School serves grades kindergarten through 12, $\frac{1}{4}$ of the School is devoted to high school use. Therefore, the School must provide 8 additional parking spaces for the high school use. This results in a total requirement of 130 spaces.

The School plans to provide 50 additional spaces in the public right-of-way along Whitehaven Parkway adjacent to the School and two additional spaces at the New Property – nine more spaces than are required by the Zoning Regulations. In addition, the Property has a practical supply of 20 parking spaces in addition to the 87 spaces that meet the requirements of the District of Columbia Municipal Regulations. The New Property will provide two additional parking spaces. This, together with the traffic mitigation measures undertaken by the School, will provide sufficient parking for the additional staff and will alleviate the current parking impacts associated with the School.

VIII.
THE APPLICANT MEETS THE STANDARDS FOR
OFF-SITE ACCESSORY PARKING SPACES

Section 214 of the Zoning Regulations provides that accessory parking spaces elsewhere than on the same lot on which the principal uses is located shall be permitted as a special exception in an R-1 Zone District. Under that section, the applicant must demonstrate that the spaces are in an open area, are located in within 200 feet of the subject property, and are contiguous to the subject property. The spaces must meet the conditions of Chapter 23 of the Zoning Regulations. Moreover, the applicant must demonstrate that it is economically impractical or unsafe to located the parking spaces on the subject property. Finally, such parking spaces must be located so as not to be objectionable to nearby property because of noise, traffic, or other objectionable conditions. The proposed 50 angled parking spaces along Whitehaven Parkway meets these conditions.

A. Location of the Parking Spaces

As shown on the Plan, the proposed parking spaces will be located in an open area in the public right-of-way along Whitehaven Parkway in front of the School in satisfaction of § 214.2. As required by §§ 214.3 and 214.4, they are immediately adjacent to the Property.

B. Compliance with Chapter 23

The proposed parking spaces will comply with the provisions of Chapter 23 of the Zoning Regulations. The area will be paved with an all-weather impervious surface as required by the District of Columbia Department of Transportation (“DDOT”). There will be no structures or lighting related to the parking lot. The School plans to provide a five-foot wide planting strip that will include appropriate plants and trees. These plants and trees will be maintained in a healthy, growing condition by the school. The School plans to retain the existing healthy mature trees. There is no residential property contiguous to the proposed parking area.

C. Economically Impracticable or Unsafe

It would be economically impracticable to locate additional parking spaces on the Property because of the unusual condition of a wetland area and because of the existing improvements on the lot. As the site plan demonstrates, a substantial portion of the Property is occupied by a creek and related wetland area. The School is required to replace any wetland area it uses with an equal amount of wetland property. The School cannot relocate this wetland area without purchasing a wetland area off-site. The remainder of the lot is improved with existing buildings and parking spaces. There is little room on the Property for substantial additional parking spaces without removing the creek and wetland area.

D. No Objectionable Noise, Traffic, or Other Objectionable Conditions

The installation of the proposed angled parking spaces will be a significant improvement over existing conditions. As shown in the attached photographs, the existing parallel parking

spaces located along Whitehaven Parkway are unmarked and unsightly. There is no curb, which causes erosion of adjacent soil. People frequently park their cars on the grass and soil, resulting in a continuous muddy area along the side of the street. The current conditions along Whitehaven Parkway are unsafe for pedestrians. As the Traffic Study determined: “A significant amount of pedestrian traffic uses Whitehaven Parkway from the west to enter school property where a sidewalk is not currently available. These pedestrians conflict with vehicular traffic using the Whitehaven Parkway travel lanes.” (Exhibit H, p. 8). The School proposes an alternative – more parking spaces that are safe, attractive and well-maintained. Photos of similar parking spaces at St. Patrick’s Episcopal Day School are attached as Exhibit D. The parking area will be adequately paved and striped and will be furnished with bumper stops. The School will provide a new sidewalk, which will increase pedestrian safety. The Traffic Study states that “[t]he angled spaces would be located behind the current travel way and would not encroach the current roadway along Whitehaven Parkway. **This would provide for a safe condition for both the traveling public and the parkers along the roadway.**” (Exhibit H, p. 7). The planting strip will be a vast improvement over existing conditions with its new plants and trees. The proposed angled spaces will not cause objectionable traffic conditions. Indeed, the street will be wider along the portion abutting the parking area, resulting in an improved traffic flow.

IX.
WITNESSES

- A. Sally L. Smith, The Lab School of Washington, Founder/Director
- B. Allyn Kilsheimer, KCE Structural Engineers, Project Engineer
- D. Martin J. Wells, P.E. Wells & Associates, Traffic Consultant

X.
LIST OF EXHIBITS

- Exhibit A: Photographs of Lab School Classrooms
- Exhibit B: Photographs of Existing Conditions
- Exhibit C: Existing Conditions Plan
- Exhibit D: Photographs of St. Patrick's Episcopal Day School Back-in, Angled Parking Spaces
- Exhibit E: Plan for Proposed Back-in, Angled Parking Spaces
- Exhibit F: DDOT Memo
- Exhibit G: Support Letters
- Exhibit H: Traffic Impact Analysis
- Exhibit I: Shuttle Schedule
- Exhibit J: Outlines of Witness Testimony
- Exhibit K: Portion of the Sanborn Atlas showing the Property and the New Property
- Exhibit L: Zoning Map with Property Outlined in Green

XI.
CONCLUSION

As demonstrated above, the application meets the criteria set forth in Sections 206 and 214 for special exception approval and is, therefore, in harmony with the general purpose and intent of the Zoning Regulations. In compliance with Section 3104.1 of the Zoning Regulations, the school has demonstrated that the relief sought is in harmony with the general purposes and intent of the Zoning Regulations and will not adversely affect neighboring properties. The school respectfully requests that the Board of Zoning Adjustment approve this application.

Respectfully submitted,

Pillsbury Winthrop Shaw Pittman LLP

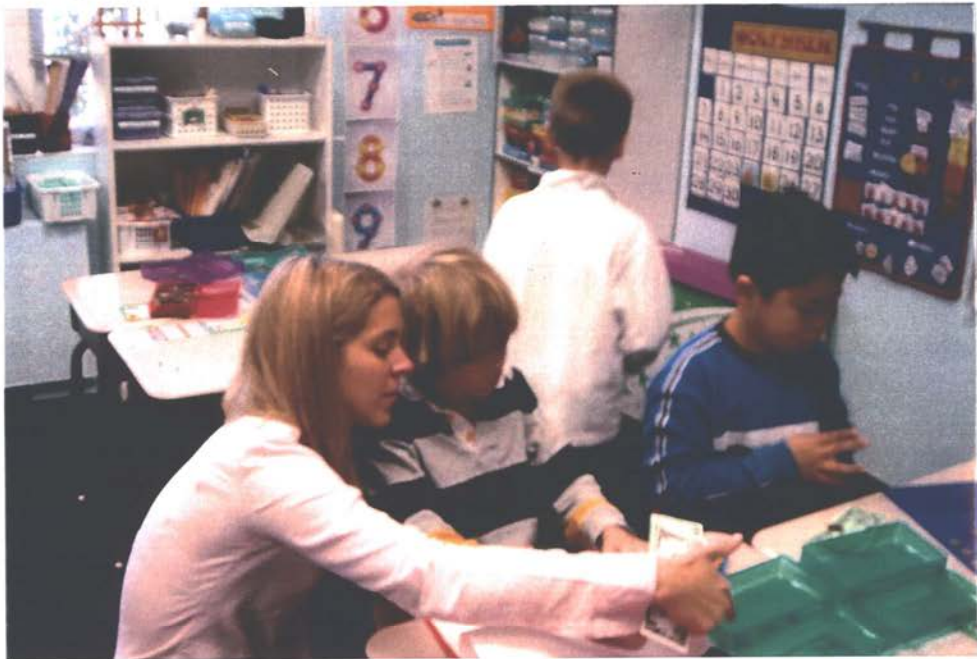
By:


Allison C. Prince

A







B







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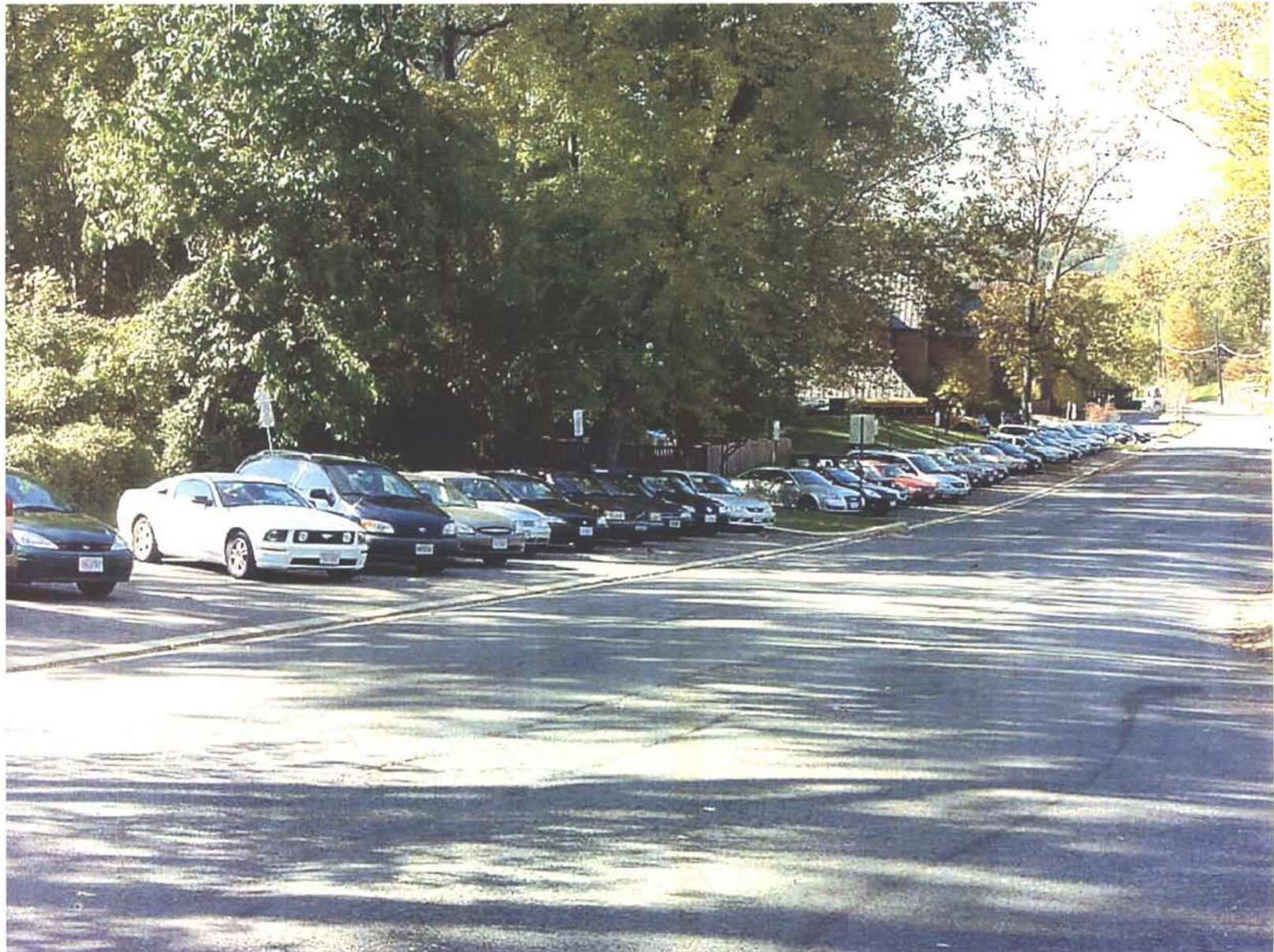
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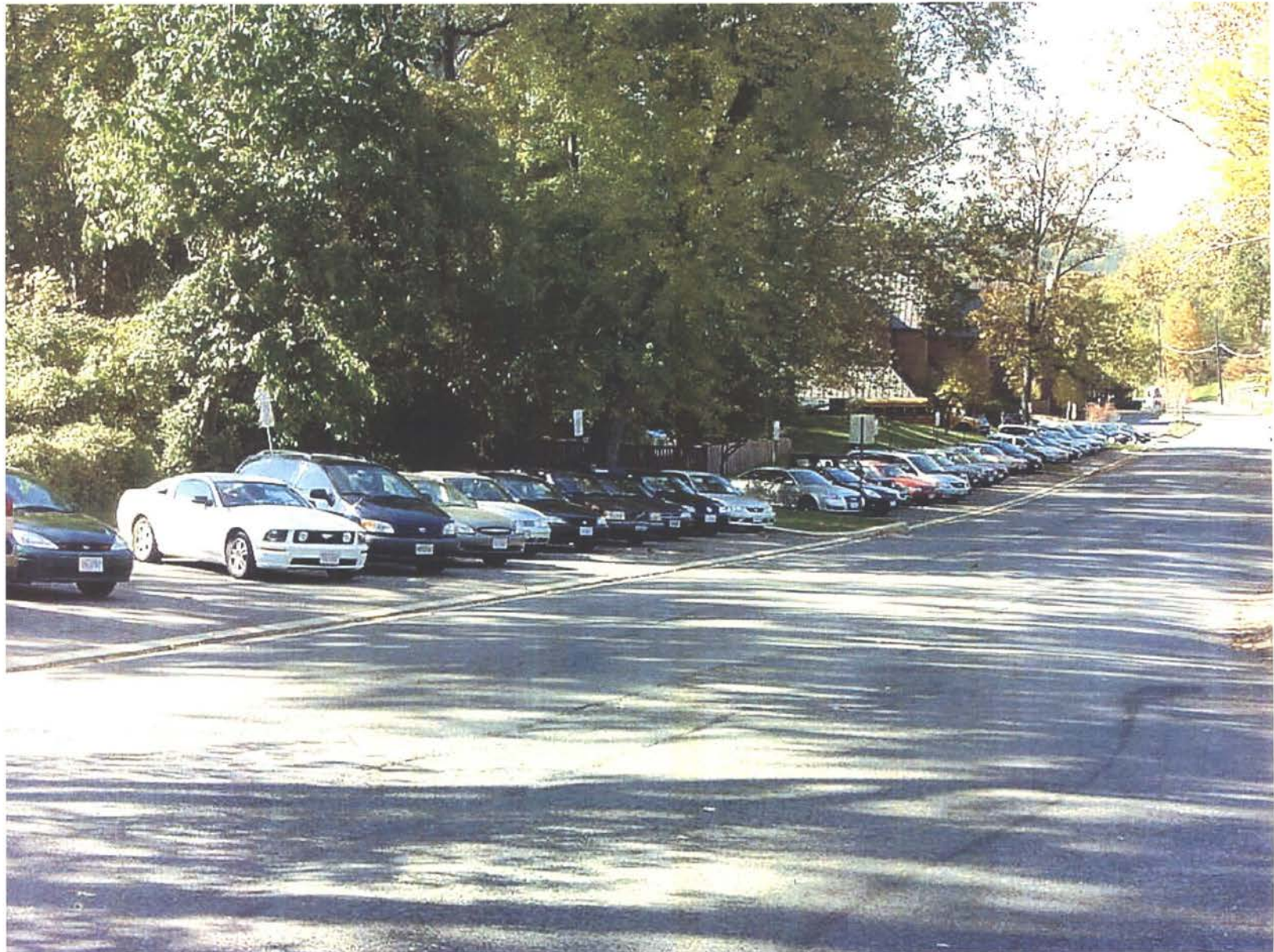
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E

	AS PLANNED	IF ADJUSTED AS ABOVE
	# OF SPACES	# OF SPACES
ON-SITE (EXISTING)	87	87
PROPOSED	50	43
IN EXIST. DRIVEWAYS	7	7
SUB-TOTAL	154	137
-ACCESS TO DRIVEWAYS	-4	-4
IN NEW PROPERTY	2	2
TOTAL	152	135

F

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DISTRICT DEPARTMENT OF TRANSPORTATION



Office of Public Space
Management Administration

TO: Allison C. Prince

FROM: Lars Etzkorn, Associate Director
District Department of Transportation

RE: The Lab School

DATE: 18 February 2005

ONE PAGE FAXED TO 202/663-8007

The District Department of Transportation (DDOT) has reviewed the proposed location and layout for approximately 50 angled parking spaces along lower Whitehaven Parkway, NW, for The Lab School. The school has incorporated certain changes requested by DDOT into the plan and DDOT finds that, from a technical standpoint only, the proposed spaces are acceptable. We understand The Lab School will request permission from the Board of Zoning Adjustment (BZA) to use these spaces to satisfy a portion of the parking requirement associated with the school. DDOT reserves the right to comment on such an application when it is filed and, by noting that the proposed location and layout plan meet DDOT design requirements, does not waive its right to comment on the BZA application. Furthermore, design changes may be necessary to take into account any changed conditions or new information.

G



PETER A. BARRETT
Head of School

April 28, 2004

Mr. Allyn Kilsheimer
KCE Structural Engineers, PC
1818 Jefferson Place, NW
Washington, DC 20036

Dear Mr. Kilsheimer:

I write in enthusiastic support of a proposal by the Lab School of Washington to construct a sidewalk and diagonal parking spaces for its faculty and staff in the public space on lower Whitehaven Parkway, NW. That support stems from my firm belief, based on St. Patrick's own experience, that the proposal offers an array of benefits with respect to functionality, safety, and appearance along that stretch of Whitehaven.

As you know, St. Patrick's constructed a sidewalk and diagonal parking spaces several years ago on upper Whitehaven, in a manner much as I understand the Lab School proposes to do. In addition to providing needed parking for faculty and staff and some visitors during school hours, that project effectively widened Whitehaven Parkway and therefore reduced traffic congestion and improved the appearance of that area.

Furthermore, providing a sidewalk greatly increased pedestrian safety there, as faculty, students, parents, and visitors—and any other individuals using that portion of Whitehaven, regardless of their relationship to St. Patrick's—no longer have to walk in the street. Finally, St. Patrick's is pleased to pay in excess of \$1,000 to the District of Columbia for the use of those spaces, revenue that would otherwise not be available to the District. By similarly reducing traffic congestion and increasing pedestrian safety along another stretch of Whitehaven and providing revenue for the District, the Lab School proposal would have benefits that go far beyond the benefits that the school itself would enjoy.

Confident that these benefits will indeed accrue based on St. Patrick's experience with a similar project, I am delighted to support the Lab School proposal.

Sincerely,

Peter A. Barrett
Head of School

cc Sally L. Smith, Director, Lab School of Washington

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WELLS & ASSOCIATES, LLC

TRAFFIC, TRANSPORTATION, and PARKING CONSULTANTS

MEMORANDUM

TO: The Lab School of Washington

FROM: Terence J. Miller
Martin J. Wells, P.E.

DATE: November 7, 2005

SUBJECT: Transportation Impact Assessment

INTRODUCTION

This memorandum presents a *transportation impact study* of The Lab School of Washington. This study identifies the traffic and parking needs of the school and evaluates potential traffic and parking mitigation measures. This study is based on information collected at school and adjacent properties, data provided by school staff, and the current application before the District of Columbia Board of Zoning Adjustment (BZA) to add 50 angled parking spaces on the south side of Whitehaven Parkway adjacent to the school.

Specific tasks undertaken as part of this study include:

1. Identification of current traffic and parking demands generated by the school,
2. Evaluation of the adequacy of the existing on-site parking supply,
3. Evaluation of parking impacts on adjacent commercial properties and public streets, and
4. Identification of strategies for mitigating the school's traffic and parking impacts.

BACKGROUND INFORMATION

Population Profile. The Lab School of Washington currently has a faculty/staff cap of 95 and a student enrollment cap of 310. A total of 330 students

currently are enrolled in grades Primary through 12. All students arrive at approximately 8:30 AM, and dismiss at 3:30 PM, with the exception of Primary students who are dismissed at 3:00 PM. The school has a total of 182 staff members and 300 seats of assembly space in the gymnasium, as shown in Table 1.

Table 1
Lab School of Washington
Transportation Profile

Profile:

School Grades: Primary - 12th
No. of Students 330 students
No. of Faculty/Staff 182 employees
Largest Public Assembly Space: 300 seats

Arrival Time (All Grades): 8:30 AM
Dismissal Time (Primary): 3:00 PM
Dismissal Time (Elementary and Intermediate): 3:30 PM

Vehicle Trip Generation

Morning Peak Hour:

Inbound 196 vehicles
Outbound 101 vehicles
Total 297 vehicles

Afternoon Peak Hour:

Inbound 130 vehicles
Outbound 235 vehicles
Total 365 vehicles

Parking

Maximum Parking Occupancy (morning 10:00 AM):

On-Site 91 vehicles
Off-Site 84 vehicles
Total 175 vehicles

Maximum Parking Occupancy (afternoon 2:00 PM):

On-Site 88 vehicles
Off-Site 66 vehicles
Total 154 vehicles

Design Hour Occupancy 175 vehicles

District of Columbia Code Requirement 132 spaces

Parking Provided:

On-Site (Practical Capacity) 107 spaces
Additional Parking Required (Actual Demand) 68 spaces
Additional Parking Required (Code) 25 spaces

On-Site (Legal Spaces) 87 spaces
Additional Parking Required (Actual Demand) 88 spaces
Additional Parking Required (Code) 45 spaces

Mode Split

Morning

Private Auto/School Bus 100%
Transit Bus 0.0%
Walk 0.0%

Afternoon

Private Auto/School Bus 99%
Transit Bus 1.0%
Walk 0.0%

Private Vehicle Occupancy

Morning Drop-Off 1.18 persons/vehicle
Afternoon Pick Up 1.31 persons/vehicle

Bus Occupancy

Morning Drop-Off 6.14 persons/bus
Afternoon Pick Up 5.50 persons/bus

Data Collection. Wells & Associates collected the following information as part of this study:

- a. Parking occupancy counts at on-site lots, off-site lots, and adjacent streets including Reservoir Road, Whitehaven Parkway, MacArthur Boulevard, and Hutchinson Place.
- b. Vehicular traffic counts at the Reservoir Road entrance.
- c. Vehicle occupancy counts of students arriving and departing by private vehicle at the front door of the school.
- d. Vehicle occupancy counts of busses serving the school.
- e. Surveys of pedestrians arriving at the school from off campus.

The parking and traffic data were collected on Wednesday, October 19, 2005, from 7:00 to 10:00 AM and from 2:00 to 7:00 PM.

Current Transportation Management Plan. Currently, the majority of students arrives and departs by private vehicle and uses the Reservoir Road entrance to enter and exit the property. During the morning hours, cars and buses traverse the parking area in a counter-clockwise pattern, dropping off students at the school entrance.

During the afternoon hours, buses arrive prior to student dismissal and queue within the on-site parking areas. These buses depart via Reservoir Road under the direction of traffic control personnel.

Written Transportation Policies. The Lab School of Washington provides staff members with a written policy related to traffic and parking. Staff members are assigned spaces within the property based on tenure. Those without an assigned space must park off campus or utilize public transit. They are asked to respect the property and area to maintain good relations with the community.

The Lab School of Washington has recently purchased and operates a shuttle bus for faculty and staff who use public transportation. The faculty shuttle operates Monday through Friday, during the morning, midday, and evening peak periods, between The Lab School campus and the Tenley Metro Station and American University campus. Shuttles run twice in the morning, once during

the midday, and twice in the evening. This schedule is flexible based on faculty needs.

On-site parking for students is not provided. Older students are encouraged to use public transportation when possible. Students, who are under age 19 and District of Columbia residents, may obtain slips to purchase reduced fare cards for Metrobus and Metrorail.

Existing Trip Generation. The vehicular traffic generated by The Lab School of Washington was calculated based on the driveway counts at the Reservoir Road entrance and the pedestrian surveys at the main entrance on Reservoir Road and the gymnasium entrance on Whitehaven Parkway.

The Lab School presently generates 297 vehicle-trips during the school and commuter AM peak hour, 174 vehicle-trips during the school PM peak hour, and 121 vehicle-trips during the commuter PM peak hour, as shown in Appendix C.

Vehicle Occupancy. The vehicle occupancy for school-generated traffic was identified based on surveys of vehicles conducted at the same times as the traffic counts. The results, which are summarized in Appendix D, indicate an average auto occupancy of 1.18 persons per vehicle during the school AM peak hour and 1.31 persons per vehicle during the school PM peak hour. Student vehicle occupancy on buses was observed at 6.14 persons per bus during the school AM peak hour and 5.50 persons per bus during the school PM peak hour.

Mode Split. The mode split of school generated trips was calculated based on off-site pedestrian surveys and observed vehicle occupancy. The results indicate that 99 to 100 percent of all persons arrive and depart by private vehicle or school busses. The remaining one percent is attributed to transit busses and walkers.

PARKING ANALYSIS

Overview. This section discusses the school's existing parking supply, existing parking demands, the 50 angled parking spaces proposed on Whitehaven Parkway, and compliance with the District of Columbia Municipal Regulations.

Supply. A total of 107 spaces, including marked and unmarked spaces, are provided on-site. These spaces are delineated into seven visitor spaces, three

handicapped spaces, 83 numbered and loading spaces, three Occupational Therapy building driveway spaces, eight Development building driveway spaces, and three unmarked spaces. There are 87 legal, marked spaces on campus. (Nine curb parking spaces on the main campus are not available during the afternoon peak period. Only 98 total spaces are available on the campus at that time).

Occupancy. The school generates a peak demand for 175 parking spaces during the morning peak hour (10:00 AM). Ninety-one vehicles (or 52 percent of all vehicles) parked on-site and 84 vehicles (or 48 percent) parked in off-site lots or adjacent streets. The afternoon peak hour occurred at 2:00 PM, when a total of 154 vehicles (88 on-site, 66 off-site) were recorded. The tabulated parking data is contained in Appendix A.

The highest amount of off-site parking occurred on Whitehaven Parkway during the morning hours (27 vehicles). During the afternoon hours, the highest amount of off-site parking occurred on Reservoir Road (18 vehicles).

The on-site parking occupancy was 85 percent during the morning peak hour (i.e., $91/107 = 0.85$) and 82 percent during the afternoon peak hour ($88/107 = 0.82$).

Overall, total parking demand exceeds the on-site supply by 68 spaces during the morning peak hour (i.e., $175 - 107 = 68$), and 56 spaces during the afternoon peak hour ($154 - 98 = 56$).

District of Columbia Parking Requirements. The District of Columbia Municipal Regulations requires two parking spaces for every three faculty/staff member and one space for each seat within the largest assembly space for high schools. Accordingly, The Lab School of Washington would require 130 parking spaces for the proposed faculty/staff and student enrollment caps. This is 23 more spaces than the existing practical supply of 107 on-campus parking spaces (i.e., $130 - 107 = 23$) and 43 more spaces than the legal supply of 87 on-campus spaces (i.e., $130 - 87 = 43$).

An additional 68 spaces would be required to adequately accommodate the school's peak parking demand for 175 spaces. Alternatively, parking demands would need to be reduced, through transit, ride-sharing, and/or other means, to comply with the District of Columbia Municipal Regulations.

Angled Parking Spaces. The Lab School proposes to construct 50 back-in angled parking spaces with wheel stops and a sidewalk within the public right-of-way on the south side of Whitehaven Parkway adjacent to the school. These spaces are similar in design and function to the angled spaces constructed by St. Patrick's Episcopal Day School on the south side of Whitehaven Parkway, west of Foxhall Road.

A sidewalk would be constructed as part of this improvement to provide safe access for pedestrians along Whitehaven Parkway. The angled spaces would be located behind the current travel way and would not encroach the current roadway along Whitehaven Parkway. This would provide for a safe condition for both the traveling public and the parkers along the roadway.

The proposed angled parking spaces meet the District Department of Transportation's (DDOT) design criteria. DDOT's qualified support for these spaces is presented in Appendix B.

Traffic Analysis

Overview. This section discusses existing traffic volumes on MacArthur Boulevard and the Lab School driveway, observed traffic patterns on the Lab School campus, existing intersection delays and levels of service, the traffic impacts of the angled parking spaces, and traffic impacts of the additional faculty/staff and students.

Data Collection. Traffic and pedestrian data was collected at the Reservoir Road entrance during both the morning and afternoon peak hours to identify the numbers of trips presently generated by the school and to assess intersection capacity. The counts, which were recorded by 15-minute interval, indicate that the morning peak hour occurred between 7:45 and 8:45 AM and the afternoon peak hour occurred between 3:15 and 4:15 PM. These results are summarized in Appendix C.

Counts of existing traffic at the Macarthur Boulevard/Lab School Driveway/Reservoir Road, Macarthur Boulevard/Reservoir Road, and Reservoir Road/Whitehaven Parkway intersections were obtained from recent transportation impact studies¹.

¹ Wells & Associates, Friends of St. Patrick's Transportation Impact Study, September 7, 2005.

Field Observations. Pedestrians were observed entering the school from Reservoir Road and Whitehaven Parkway. The majority of pedestrians approaches the school from the west on Reservoir Road and traverses the main entrance and drive aisle to access the main building entrance. Several vehicle/pedestrian conflicts occur within the main parking area where no sidewalk is available between Reservoir Road and the building.

A significant amount of pedestrian traffic uses Whitehaven Parkway from the west to enter school property where a sidewalk is not currently available. These pedestrians conflict with vehicular traffic using the Whitehaven Parkway travel lanes.

Intersection Capacity Analyses. The intersections of the east and west legs of Reservoir Road with MacArthur Boulevard are controlled by traffic signals. Whitehaven Parkway, which is located between the east and west legs of Reservoir Road, is controlled by a stop sign at MacArthur Boulevard.

Existing and projected levels of service at these three intersections were evaluated based on the methodologies specified in the Highway Capacity Manual (HCM). Three peak hours were evaluated:

1. The commuter and school AM peak hour,
2. The school PM peak hour, and
3. The commuter PM peak hour.

The results are presented in Table 2.

Existing Levels of Service. The commuter and school AM peak hour is the critical peak hour in the study area. The intersections of MacArthur Boulevard with the east and west legs of Reservoir Road and Whitehaven Parkway currently operate at capacity at level of service (LOS) "F" during the school and commuter peak hour due primarily to high volumes of commuting traffic on MacArthur Boulevard and Reservoir Road.

The intersections of MacArthur Boulevard with the east and west legs of Reservoir Road operate at an acceptable LOS "A" or "B" during the school and commuter PM peak hours.

Traffic turning off of Whitehaven Parkway theoretically operates at LOS "F" during both the school and commuter PM peak hours. In practice, the traffic signals at the east and west legs of Reservoir Road create gaps in traffic along MacArthur Boulevard that allow motorists to turn onto the Boulevard with less delay than predicted by the HCM.

Future Levels of Service with Angled Parking Spaces. Wells & Associates evaluated the traffic impacts of shifting 50 parking spaces from the area wide parking supply to Whitehaven Parkway.

These additional parking spaces, *per se*, would not create any additional traffic. They would, however, re-direct traffic toward the MacArthur Boulevard/Whitehaven Parkway intersection and away from other intersections in the surrounding community. It is estimated that 50 angled parking spaces at the west end of Whitehaven Parkway would *increase* traffic at the MacArthur Boulevard/Whitehaven Parkway intersection by 40 trips (or 1.3 percent) during the school and commuter AM peak hours, by 13 trips (or 0.7 percent) during the school PM peak hour, and by 3 trips (or 0.2 percent) during the commuter PM peak hour.

These additional trips would not significantly impact the existing AM Peak Hour delay, because the delay is already extremely high. These additional trips would *increase* average southbound delays per vehicle at the MacArthur Boulevard/Whitehaven Parkway intersection by 13.2 seconds during the school PM peak hour, and there would be zero increase in delay during the commuter PM peak hour, as shown in Table 2. Delays vary from day to day due to fluctuating traffic volumes. These small additional delays would not change existing peak hour levels of service. They are well within the range of delays currently experienced during weekday peak hours along MacArthur Boulevard and would not be perceptible to the average motorist.

Table 2
Lab School
Future Intersection Levels of Service With Angled On-Street Parking

Intersection	Type of Control	Current Parking Plan			Whitehaven Pkwy Parking			Approved			
		AM	PM (School)	PM (Commuter)	AM	PM (School)	PM (Commuter)	AM	PM (School)	PM (Commuter)	
Reservoir Road/MacArthur Boulevard (west)	Signal										
		Westbound	A(8.0)	A(2.4)	A(1.6)	A(8.0)	A(2.4)	A(1.8)	A(7.8)	A(2.4)	A(1.6)
		Northbound	A(8.8)	A(4.0)	A(3.8)	A(8.7)	A(4.2)	A(3.8)	A(8.7)	A(4.0)	A(3.4)
		Southbound	F(431.8)	D(42.8)	D(44.8)	F(458.9)	D(42.8)	D(44.8)	F(439.8)	D(42.8)	D(44.6)
		Overall	F(111.9)	A(4.4)	A(3.1)	F(118.4)	A(4.5)	A(3.0)	F(113.3)	A(4.4)	A(2.8)
Reservoir Road/Whitehaven Parkway	Stop Sign										
		Eastbound TL Southbound LR	A[2.6] F[*]	A[1.1] F[62.4]	A[0.7] F[73.4]	A[3.2] F[*]	A[1.1] F[75.6]	A[0.7] F[73.4]	A[2.5] F[*]	A[0.9] F[53.7]	A[0.7] F[70.9]
Reservoir Road/Lab School/ MacArthur Boulevard (east)	Signal										
		Eastbound	E(78.1)	B(13.8)	B(13.1)	F(80.7)	B(13.9)	B(13.1)	E(74.4)	B(13.7)	B(13.0)
		Westbound	B(14.3)	A(7.7)	B(11.0)	B(14.5)	A(7.7)	B(11.0)	B(14.0)	A(7.6)	B(10.9)
		Northbound	D(46.3)	D(39.1)	D(38.8)	D(46.3)	D(39.1)	D(38.8)	D(45.3)	D(39.0)	D(38.9)
		Southbound	D(41.0)	D(42.0)	D(42.0)	D(41.0)	D(42.0)	D(42.0)	D(41.0)	D(42.0)	D(42.0)
Overall	E(64.0)	B(19.3)	B(19.3)	E(65.6)	B(19.3)	B(19.3)	E(61.5)	B(19.2)	B(19.2)		

Notes:

¹ Analysis performed using Synchro/SimTraffic Version 6.0

² An asterisk (*) indicates delays greater than 999.9 seconds.

Existing Faculty/Staff and Student Enrollment Caps. The Lab School presently has approved caps of 95 faculty and staff and 310 students. The Lab School currently employs 182 faculty and staff and enrolls 330 students. This is 87 (or 92 percent) more faculty and staff, and 20 (or 7 percent) more students, than currently approved by the Board of Zoning Adjustment (BZA). Table 2 shows the peak hour intersection levels of service and delays that are predicted based on the lesser, approved faculty/staff and student enrollment caps.

87 fewer faculty/staff and 20 fewer students would generate 142 (or 48 percent) fewer trips during the school and commuter AM peak hours, 83 (or 48 percent) fewer trips during the school PM peak hour, and 58 (or 48 percent) fewer trips during the commuter PM peak hour.

These trip reductions would not decrease the southbound average delays per vehicle at the MacArthur Boulevard/Whitehaven Parkway intersection during the school and commuter AM peak hour, because the existing delay is extremely high. These trip reductions would decrease the southbound average delays per vehicle at the MacArthur Boulevard/Whitehaven Parkway intersection by 8.7 seconds (or 14 percent) during the school PM peak hour, and by 3 seconds (or 4 percent) during the commuter PM peak hour, as shown in Table 2. These small reduced delays would not significantly change existing peak hour levels of service. (The MacArthur Boulevard/Whitehaven Parkway intersection theoretically would operate at LOS "E" instead of LOS "F" during the school PM peak hour.) These small reduced delays are well within the range of delays currently experienced during weekday peak hours along MacArthur Boulevard and would not be perceptible to the average motorist.

CONCLUSIONS

The conclusions of this study are as follows:

1. The Lab School of Washington currently has a faculty/staff cap of 95 and a student enrollment cap of 310. The school currently employs 182 faculty/staff and enrolls 330 students. This is 87 (or 92 percent) more faculty/staff and 20 (or 7 percent) more students than currently approved by the BZA. The Lab School proposes to increase the faculty/staff cap to 182 and student enrollment to 330.
2. The Lab School presently is served by 107 marked and unmarked on-campus parking spaces, 87 of which comply with the District of Columbia Municipal Regulations.
3. The school generates a peak demand for 175 parking spaces. Ninety-one vehicles (or 52 percent of all vehicles) park on-site and 84 vehicles (or 48 percent) park in off-site lots or adjacent streets.
4. District of Columbia Municipal Regulations require 130 parking spaces for the proposed caps of 182 faculty/staff and 330 students. This is 23 more spaces than the practical on-campus supply of 107 spaces and 43 more spaces than the current on-campus supply of 87 legal spaces.
5. The proposed 50 additional angled parking spaces, if dedicated to The Lab School, would provide the school with a total of 137 parking spaces, which is 7 more spaces than required by the Municipal Regulations. The spaces provided along with the planned sidewalk would create a safe and efficient environment along Whitehaven Parkway.
6. The school presently generates 297 vehicle-trips during the school and commuter AM peak hour, 174 vehicle-trips during the school PM peak hour, and 121 vehicle trips during the commuter PM peak hour.
7. The intersections of MacArthur Boulevard with the east and west legs of Reservoir Road and Whitehaven Parkway currently operate at capacity at level of service (LOS) "F" during the school and commuter peak hour due primarily to high volumes of commuting traffic on MacArthur Boulevard and Reservoir Road. They operate at an

acceptable LOS "A" or "B" during the school and commuter PM peak hours.

Traffic turning off of Whitehaven Parkway theoretically operates at LOS "F" during both the school and commuter PM peak hours. In practice, the traffic signals at the east and west legs of Reservoir Road create gaps in traffic along MacArthur Boulevard that allow motorists to turn onto the Boulevard with less delay than predicted by the Highway Capacity Manual.

8. The proposed 50 additional angled parking spaces, *per se*, would not create any additional traffic. They would, however, re-direct traffic *toward* the MacArthur Boulevard/Whitehaven Parkway intersection and *away from* other intersections in the surrounding community.
9. The proposed angled parking spaces would not change existing peak hour levels of service. Additional localized delays that they may cause are well within the range of delays currently experienced during weekday peak hours along MacArthur Boulevard and would not be perceptible to the average motorist.
10. The Lab School would generate 142 (or 48 percent) fewer trips during the school and commuter AM peak hours, 83 (or 48 percent) fewer trips during the school PM peak hour, and 58 (or 48 percent) fewer trips during the commuter PM peak hour, if it complied with currently approved faculty/staff and student enrollment caps.
11. These trip reductions would not significantly change existing peak hour levels of service. These small reduced delays are well within the range of delays currently experienced during weekday peak hours along MacArthur Boulevard and would not be perceptible to the average motorist.