

Government of the District of Columbia

Department of Transportation



d. Planning and Sustainability Division

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment
KB

FROM: Kelsey Bridges
Manager, Neighborhood Planning Branch

DATE: September 18, 2026

SUBJECT: BZA Case No. 17429B – 4707, 4700, 4751, and 4753 Whitehaven Parkway NW and 1800 block of Foxhall Road NW

APPLICATION

St. Patrick's Episcopal Church and Day School (the "Applicant"), pursuant to Title 11 of the *District of Columbia Municipal Regulations (DCMR)*, requests a Modification of Condition 7 of Board of Zoning Adjustment Order Number 17429, and Area Variance to the building height setback requirements of Subtitle D § 203.6, and Special Exceptions to the loading requirements of Subtitle C § 901.1 and the private school use permissions of Subtitle U § 203.1(m) and Subtitle X § 104. They seek to construct a new semi-detached four-story school building to the existing campus. The site is in the R-1B Zone at 4707, 4700, 4751 & 4753 Whitehaven Pkwy NW & 1800 Block of Foxhall Rd NW (Square 1346, 1372, and 1374, Lots 827, 817, 15, 838, and 839). The site is not served by a public alley.

SUMMARY OF DDOT REVIEW

The District Department of Transportation (DDOT) is committed to achieving an exceptional quality of life by encouraging sustainable travel practices, safer streets, and outstanding access to goods and services. To achieve this vision, DDOT works through the zoning process to ensure that impacts from new developments are manageable within and take advantage of the District's multi-modal transportation network and, as necessary, propose mitigations that are commensurate with the action. After an extensive review of the case materials submitted by the Applicant, including the August 2026 Comprehensive Transportation Review (CTR) study ([Exhibit 30A](#) in the case record), DDOT finds:

- Zoning requires 93 off-street vehicle parking spaces. The Applicant is proposing 119 spaces;
- The site is over one mile from the nearest Metro Rail station and more than ¼ mile High Frequency Network Metro Bus route;
- The property currently has six curb cuts; two along the north side of Whitehaven Parkway.

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- serving the garage below the gymnasium and four along the south side of Whitehaven Parkway, providing access to the trash area, surface parking lot, and the Pick-up/Drop-off (PUDO) lane loop;
- PUDO activities will be located along the frontage of the Middle School in the curb lane on the north side of Whitehaven Parkway NW in addition to the current PUDO zone in front of the Lower School on the south side of Whitehaven Parkway NW;
- Zoning requires one (1) loading berth and one (1) service/delivery space. The Applicant is providing no additional loading berths in conjunction with the establishment of a Loading Management Plan;
- The CTR indicated that none of the study intersections would unacceptably degrade in Level of Service (LOS) nor would the vehicle queueing meet the threshold of a “significant impact” due to the addition of site-generated vehicle trips. Therefore, no mitigation for traffic impacts is requested;
- DDOT requires the Applicant commit to a Transportation Demand Management (TDM) Plan as the site has 10,000 square feet or more of non-residential use and the requested relief otherwise results in an increase in trips;
- The Applicant and DDOT collaborated on a Transportation Management Plan, comprising a TDM Plan, Management Plan (focused on the pick-up and drop-off activities, Loading Management Plan (LMP), Parking Management Plan, and Monitoring Plan TDM Plan (see Recommendation section below) to support non-automotive travel to and from the site; and
- Given the Applicant’s proposed Transportation Management Plan (that will incorporate recommended revisions by DDOT) to reduce vehicle trips by 20% through a robust TDM plan, manage parking, loading, and student pick-up and drop-off operations, and monitor travel behavior through annual traffic and parking counts, surveys, and queueing studies to ensure the TDM goals are met and remediate noted concerns, the impacts on the transportation network are expected to be minimal.

RECOMMENDATION

DDOT has no objection to the approval of the requested relief with the following conditions:

- The Applicant shall implement a Transportation Management Plan for the life of the project, comprising a Transportation Demand Management (TDM) Plan, Management Plan (focused on the pick-up and drop-off activities, Loading Management Plan (LMP), Parking Management Plan, and Monitoring Plan; subject to the following revisions to be completed in collaboration with DDOT:
 - Minor revisions to the TDM Plan that will address some factual corrections and add specificity in some areas;
 - Substantive revisions to the Loading Management Plan to align with standard requirements outlined in DDOT’s 2024 *Guidance for CTR*; and
- The Applicant submit a public space permit application to improve the existing crosswalk on Whitehaven Parkway at the gym as a raised crosswalk with daylighting and a Rectangular Rapid Flashing Beacon (RRFB) and install striping and signage to support the pick-up and drop-off activity along Whitehaven Parkway, subject to DDOT approval

TRANSPORTATION ANALYSIS

Vehicle Parking

The overall parking demand created by the development is primarily a function of land use, development square footage, price, and supply of parking spaces. However, in urban areas, other factors contribute to the demand for parking, such as the availability of high-quality transit, frequency of transit service, proximity to transit, connectivity of bicycle and pedestrian facilities within the vicinity of the development, demographic composition, and other characteristics.

Title 11 of the *District of Columbia Municipal Regulations (DCMR)*, Subtitle C § 701.5 and § 702.1a requires a minimum of 93 vehicle parking spaces. After accounting for being located over 1 mile from Metro Rail, the DDOT preferred maximum is 140 vehicle parking spaces. The Applicant is providing 119 parking spaces with 62 in the current gym structure, 41 spaces on Whitehaven Parkway, and 16 spaces on the existing surface lot across Whitehaven Parkway at the Lower School. The spaces on Whitehaven Parkway are allowed by permission from the Department of Public Works (predating DDOT) since 1999 and the Applicant pays annual rent to the District for the use of public space for vehicular parking. No new parking is being proposed in conjunction with the construction of the Middle School.

Bicycle Parking

The project is required by Zoning to provide five (5) long- and 19 short-term bicycle parking spaces. The Applicant is exceeding these requirements, providing 28 long- and 20 short-term bicycle parking spaces. The Applicant will locate long-term bicycle parking on the ground floor of the new building. Final locations for short-term bicycle parking will be determined with input from DDOT during the public space process.

Loading

DDOT's practice is to accommodate loading operations safely and efficiently, while prioritizing pedestrian and bicycle safety and limiting negative impacts to traffic operations. For new developments, DDOT requires that loading take place in private space and that no back-up maneuvers occur in the public realm. Access to this building for loading and unloading, delivery and trash pick-up is an important consideration, and DDOT expects the Applicant to comply with DDOT's standards for loading.

Per Title 11 of the *DCMR*, Subtitle C § 901.1, the project is required to provide one (1) 30-foot berth with a platform and one (1) 20-foot delivery space. The Applicant is requesting relief from these requirements since the Applicant does not expect the relocation of the Middle School to increase the number of deliveries. The presence of Heritage trees and large amounts of bedrock at the new site make it unfeasible to construct a new loading at the new campus. DDOT supports the requested relief on the condition that a Loading Management Plan (LMP) be implemented outlining procedures for trash collection and truck deliveries. Trash must be stored entirely on private property and out of the view of the sidewalk.

Pick-up/Drop-off

The Applicant is proposing a new PUDO zone in front of the middle school, in the curb lane on the north side of Whitehaven Parkway NW. This zone would operate in addition to the existing PUDO area in front of the Lower School on the south side of Whitehaven Parkway NW. The current PUDO zone at the Lower

School can accommodate approximately 45 vehicles. The proposed new PUDO zone at the middle school has capacity for twelve (12) vehicles.

Per the CTR, families with children in the Lower and Middle Schools would drop-off and pick-up their children in front of the Lower School while those with children in the Middle School alone would drop-off and pick-up their children in the proposed PUDO lane in front of the new middle school building.

With implementation of the proposed TDM plan, queues are expected to be shorter than existing conditions due to several operational improvements: dismissal times will be staggered, two traffic control officers at the Lower School will help manage vehicular and pedestrian flow, and parents will be assigned a designated PUDO zone and provided corresponding passes.

Mode Split and Trip Generation

Each trip a person makes is made by a certain means of travel, such as vehicle, bicycle, walking, and transit. The means of travel is referred to as a ‘mode’ of transportation. A variety of elements impact the mode of travel, including density of development, diversity of land use, design of the public realm, proximity to transit options, availability and cost of vehicle parking, among many others.

Mode split assumptions used in the analysis were informed by a survey conducted in February 2025. As shown in Figure 1 below, the mode splits assumed were 94% automotive for students and 89% for faculty and staff, the remainder of trips are anticipated to be made by school bus or walking and bicycling.

Figure 1 | Summary of Mode Split Assumptions

Mode	Students		Faculty/Staff [†]
	AM	PM	
Auto	94%	94%	89%
School Bus	3%	3%	---
Transit	0%	0%	7%
Walk/Bike	3%	3%	3%
Telework	---	---	1%
AVO	1.39	1.42	1.10
[†] The response rate for the survey was 84.8% (105 employees were surveyed and 89 responded) yielding a margin of error of ±5% at a 95% confidence interval.			

Source: Wells and Associates 08/14/26 CTR, Table 6

The study provided trip generation estimates based on trip counts conducted in 2025. Trip generation rates were calculated based on the existing student populations. The rates were then used to estimate the number of vehicle trips under the proposed student cap of 555 students and 140 faculty/staff. DDOT finds these methods appropriate. As shown below in Figure 2, the projected person and vehicle trips met DDOT’s thresholds in the 2024 Guidance for *Comprehensive Transportation Review* for further analysis (100 total person trips OR 25 inbound or outbound vehicle trips during any one of study periods). As such, a Comprehensive Transportation Review (CTR) study with traffic impact analysis (TIA) was required.

Figure 2 | Multi-Modal Trip Generation Summary

Trip Type	AM Peak Hour			PM School Peak Hour			PM Commuter Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
Lower School Trip Generation (405 students)									
Total Person Trips	402	3	405	2	243	245	2	148	150
Auto Person Trips	374	3	377	2	228	230	2	138	140
Walk/Bike Person Trips	15	0	15	0	8	8	0	6	6
Transit Trips	13	0	13	0	7	7	0	4	4
Vehicle Trips	280	231	511	149	173	322	86	126	212
Middle School Trip Generation (150 Students)									
Total Person Trips	146	2	148	5	123	128	*	*	*
Auto Person Trips	125	2	127	5	52	57	*	*	*
Walk/Bike Person Trips	5	0	5	0	3	3	*	*	*
Transit Trips	16	0	16	0	68	68	*	*	*
Vehicle Trips	116	99	215	48	57	105	32	51	83
Adjustment for Consolidated Campus[†]									
Total Person Trips	0	0	0	0	0	0	0	0	0
Auto Person Trips	0	0	0	0	0	0	0	0	0
Walk/Bike Person Trips	0	0	0	0	0	0	0	0	0
Transit Trips	0	0	0	0	0	0	0	0	0
Vehicle Trips	-24	-24	-48	-15	-15	-30	-10	-10	-20
Total Whitehaven Campus (555 Students)									
Total Person Trips	548	5	553	7	366	373	*	*	*
Auto Person Trips	499	5	504	7	280	287	*	*	*
Walk/Bike Person Trips	20	0	20	0	11	11	*	*	*
Transit Trips	29	0	29	0	75	75	*	*	*
Vehicle Trips	372	306	678	182	215	397	108	167	275
* Person counts were not conducted at the Middle School during the PM Commuter Peak Hour. † The adjustment for the consolidated campus accounts for families who have students in both the Middle School and the Lower School and drive students to each school. Once the Middle School is relocated, they will make one trip to campus, not two separate trips to campus.									

Source: Wells and Associates 08/14/26 CTR, Table 8

Traffic Impact Analysis (TIA)

DDOT aims to provide a safe and efficient roadway network that provides for the timely movement of people, goods, and services. As part of the evaluation of travel demand generated by the site, DDOT requests analysis of traffic conditions for the agreed upon study intersections for the current year and after the facility opens both with and without the site development or any transportation changes.

To determine the proposed development's impacts on the transportation network, the Applicant completed a Traffic Impact Analysis (TIA) as a component of the CTR which includes an extensive analysis of existing conditions, future with no development, and future conditions with development. DDOT required the CTR to account for future growth in traffic on the network or what is referred to as background growth. Background growth is made up of local traffic growth from approved but not

constructed nearby land development projects and regional traffic growth further away from the site based on forecasts from the Metropolitan Washington Council of Governments' (MWCOC) regional travel demand model.

The Applicant coordinated with DDOT on the appropriate background developments to include in the analysis. Traffic from one (1) specific future project (15,377-square-foot addition to the Field School located at 2301 Foxhall Road NW) was accounted for as a background development anticipated to be constructed and open by 2029. The Applicant also coordinated with DDOT on an appropriate method for taking into account regional growth. Annually compounding background regional growth rates of between 0.25% and 0.5% were assumed in the study area, differing based on roadway and peak hour.

DDOT also requires applicants to consider future changes to the roadway network. It was determined in coordination with DDOT staff that no major changes to the local transportation network are anticipated before 2029, with the exception of some safety improvements associated with the revised PUDO area on Whitehaven Parkway.

The Applicant collaborated with DDOT to identify seven (7) existing intersections where detailed vehicle counts would be collected and a level of service analysis would be performed. These intersections are immediately adjacent to the site and include intersections radially outward from the site with the greatest potential to see impacts in vehicle delay. DDOT acknowledges that not all affected intersections are included in the study area and there will be intersections outside of the study area which would realize new trips. However, DDOT expects minimal to no increase in delay outside the study area as a result of the proposed action.

The Applicant collected weekday intersection traffic count data on Wednesday, March 19, 2025, and Wednesday, March 24, 2025, between 6:30 a.m. to 9:30 a.m. and 2:30 p.m. to 7:00 p.m. while District of Columbia Public Schools and Congress were in session.

The roadway capacity analysis provided in the CTR demonstrated that none of the seven study intersections would have an approach that degrades from Level of Service (LOS) D or better to LOS E or worse due to the addition of site generated traffic. Two intersections already operating at an LOS F will degrade slightly more as a result of the development, but each below 5% that would meet the threshold of a "significant impact" as defined by DDOT. Therefore, no mitigation for traffic impacts is requested by DDOT.

The Applicant also conducted a vehicle queuing analysis for the study intersections under existing conditions using the 50th and 95th percentile queue lengths reported by *Highway Capacity Manual 2000*. The results of the queuing analysis indicate where available storage lengths are exceeded under total future conditions, the storage lengths are exceeded under existing and/or background conditions as well, with the exception of the southbound left turn at Intersection #7 – Foxhall Road/Reservoir Road. Where those queues increase under total future conditions, the increase in queue length generally is less than one car length and in all cases, the increase is less than the 150 feet, identified by DDOT as a "significant impact." The Applicant further reviewed the queues to confirm that none of the queues are projected to impede access to the school, including the existing and proposed PUDO lanes.

For the southbound left turn at Intersection #7 – Foxhall Road/Reservoir Road, an analysis using the 20% reduction that the Applicant has committed to achieving for their TDM Plan, the southbound left queue would exceed the available storage by just 12 feet during the PM School Peak Hour and determined that minor shifts in green time at the traffic signal could be accommodated to address this queueing. These same timing adjustments also are projected to improve levels of service at the intersection during the PM School and PM Commuter Peak Hours.

Transportation Demand Management (TDM) and Performance Monitoring

As part of all land development cases, DDOT requires an Applicant to develop a comprehensive TDM plan to help mitigate an action's transportation impacts. TDM is a set of strategies, programs, services, and physical elements that influence travel behavior by mode, frequency, time, route, or trip length in order to help achieve highly efficient and sustainable use of transportation facilities. In the District, this typically means implementing infrastructure or programs to maximize the use of mass transit, bicycle and pedestrian facilities, and reduce single occupancy vehicle trips during peak periods. The Applicant's proposed TDM measures play a role in achieving vehicle trip reduction that could result in vehicle queuing and over-capacity parking.

The specific elements within the TDM plan vary depending on the land uses, site context, proximity to transit, scale of the development, and other factors. The TDM plan must help achieve the assumed trip generation rates to ensure that an action's impacts will be properly mitigated. Failure to provide a robust TDM plan could lead to unanticipated additional vehicle trips that could negatively impact the District's transportation network.

The Applicant proposed a Transportation Management Plan in the August 14, 2026, CTR, comprising a TDM Plan, an Operations Plan focused on PUDO activity, a Loading Management Plan, a Parking Management Plan, and a Monitoring Plan, which is included to this report as Attachment 1. The Applicant's proposed Monitoring Plan is intended to ensure that the TDM, Operations Management, and Parking Management plans are functioning as intended, and will include a series of studies conducted annually and submitted to DDOT and ANC 3D. With some revisions, DDOT finds the TDM component of the Transportation Management Plan to be sufficiently robust to encourage alternatives to auto travel provided the submitted Transportation Management Plan reflects their comments.

STREETSCAPE AND PUBLIC REALM

DDOT's lack of objection to this application should not be viewed as an approval of the public realm. All elements of the project proposed within District-owned right-of-way require the Applicant to pursue a public space construction permit.

The Applicant has an active public space permit application TOPS #497740 for tree planting and tree removal. A future application will be filed to cover the remaining scope of work in public space associated with the new school construction. The following items in public space will need to be resolved by the Applicant during permitting:

- Due to the potential for increased vehicle and pedestrian conflict, upgrade the crosswalk across Whitehaven Parkway near the gym to a raised crosswalk, “daylight” the crosswalk and install Rectangular Rapid Flashing Beacons (RRFB) as part of the permitting process; and
- The Applicant will coordinate with DDOT on the location of bike parking and bike PUDO in relation to proposed vehicle PUDO operations during the permitting stage.

DDOT expects the adjacent public realm to meet all District standards. The Applicant should refer to Titles 11, 12A, and 24 of the [DCMR](#), the most recent version of DDOT’s [Design and Engineering Manual](#), and the [Public Realm Design Manual](#) for public space regulations and design guidance. A permit application can be filed through the DDOT [Transportation Online Permitting System](#) (TOPS) website.

The Applicant is encouraged to participate in a Preliminary Design Review Meeting (PDRM) with DDOT and OP to discuss the public space comments noted above.

HERITAGE AND SPECIAL TREES

According to the District’s [Tree Size Estimator map](#), the property has 20 Heritage and 46 Special trees. DDOT expects that the Applicant coordinate with the Ward 3 Arborist regarding the preservation and protection of existing Heritage and Special trees, as well as the planting of new street trees. (Street tree impacts will need to be evaluated with public space site design. Meeting with arborist scheduled to discuss existing conditions and any additional street trees

Heritage Trees have a circumference of 100 inches or more and are protected by the Tree Canopy Protection Amendment Act of 2016. With approval by the Mayor and DDOT’s Urban Forestry Division (UFD), Heritage Trees might be permitted to be relocated. As such, the Applicant may be required to redesign the site plan to preserve the Non-Hazardous Heritage Trees.

Special Trees are between 44 inches and 99.99 inches in circumference. Special Trees may be removed with a permit. However, if a Special Tree is designated to remain by UFD, a Tree Protection Plan (TPP) will be required.

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