



# FRIENDS OF THE FIELD

Feb 22, 2022

**Re: Maret School BZA case #20643**

Comments on Wells + Associates Comprehensive Transportation Review

Dear Chairman Hill:

CC: ANC 3/4G, OP, PSC, DDOT

We write as community group Friends of the Field (“FoF”) a Party in opposition to Maret School’s (“Maret’s”) application for zoning relief in BZA case #20643. Maret proposes to develop a multi-sports complex on property leased from the Episcopal Center for Children (“ECC”) near the intersection of Utah and Nebraska Avenues, NW, in ANC 3/4G, SMD 02. Maret is required to submit a Comprehensive Transportation Review (“CTR,” or “Study”) as part of its submission in the BZA process. Maret’s Study was prepared by consultant firm Wells + Associates (“Wells”).

The Study was scoped in consultation with DDOT between May and August 2021. The completed Study was submitted to Maret in January 2022 and incorporated in Maret’s final BZA submission on Feb 16, 2022. On that same day, Feb 16, 2022, in a special public meeting, ANC 3/4G heard from DDOT’s reviewers of the Wells/Maret Study. Yesterday, Feb 21, 2022, ANC 3/4G Chair Randy Speck shared with Friends of the Field the ANC’s draft Resolution of support for the Maret proposal.

## **General objections**

Friends of the Field finds it necessary to object to the quality, substance, timetable, and conclusions of the Wells/Maret Study on both general and specific grounds. It is significantly flawed in scope, treats a too-limited study area, makes only a weak and narrow assessment of existing conditions, and applies ill-founded assumptions about the projected use of the proposed facilities. The likely effects of the proposed development on this densely settled,

uniformly residential neighborhood of single-family homes and mostly low-volume, low-speed local streets are interpreted far too narrowly.

The Study falls short of DDOT's own goals for CTRs. CTRs are asserted to be an improvement over "old school" Traffic Impact Assessments, or TIAs. CTRs are intended to be more sensitive to urban design considerations than a purely technical analysis would be. Yet the present Study includes many pages of charts and tables, and only scant reference to existing conditions. It is almost exclusively quantitative, and only slightly qualitative. No mention of housing and demographics, no bicycle and pedestrian count data, no crash reporting or safety statistics, no indicators of neighborhood stability – the purpose of the existing R-1-B zoning designation.

As DDOT's Aaron Zimmerman put it in a January 2021 TRB conference presentation on an anticipated Version 2.0 CTR method, the approach was meant to be so human-centered (rather than auto-centric) that it was supposed to encourage hiring review staff who would appreciate, "Less Synchro, more urban design." This means the CTR should present a more holistic rendering of what transportation means for a community, and not simply a technical traffic engineering report. It comes as a surprise, then, that the Wells/Maret Study ultimately fails to clear this bar.

At the center of the CTR concept is the idea that limiting off-street parking is a "linchpin of development," and is meant to encourage greater development density. While that focus may be appropriate in more built-up areas of the District, it is misplaced here, where Wells found an abundance of available "underutilized" curbside parking. The Study never had to grapple seriously with the issue of parking pressure. On the contrary, the planned creation of a nearly 50-vehicle parking lot, and the dedication of public space to create a commercial driveway for access, will establish a magnet for SOV trips. Shaded, free, copious off-street parking in a quiet, safe residential neighborhood will incentivize exactly the kinds of Single Occupancy Vehicle ("SOV") trips that a CTR and its Transportation Demand Management ("TDM") component are meant to discourage.

The Maret/Wells Study and its DDOT reviewers have been impervious to suggestions to improve the Study and make its review more meaningful and applicable. For example, establishing an extraordinarily constrained study area that completely avoids mentioning the most important cross-town commuter route in the vicinity, is inexcusable. For years the corridor of convenience from Silver Spring via Wise Road – Oregon Avenue – Nebraska Avenue to Connecticut Avenue and beyond has been extremely popular. When facts that this

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neighborhood has been disrupted for years with major construction and closures of major roadways were brought to DDOT's attention, they were ignored.

For example, in June of 2021, when the present Study was being scoped, the *Washington Post* reported on the closure of upper Beach Drive (controlled by the National Park Service, and classified by DDOT as a Minor Arterial) and its spillover effects on nearby neighborhoods.\* Concurrently, Oregon Avenue had been disrupted for years already, first for major storm sewer work, and then (and still) for complete, full-depth roadway reconstruction – a DDOT project – along its entire nearly 1.7 mile length between Military Road and Western Avenue. Had Wells or DDOT spoken to any neighbor, they would have been made aware that the combined closures and reconstructions, combined with COVID-19 pandemic work-from-home conditions, had eliminated this important cross-town commuter route.

When this was brought directly to DDOT's attention, at least twice, it was ignored. First there was a letter (Nov 10, 2021) from Claudia Russell, a neighbor who lives on Nebraska adjacent to the ECC fields. A second letter, from Friends of the Field, was sent to Mr. Zimmerman Jan 6, 2022. Both letters anticipated that the forthcoming Wells study might not adequately handle these extraordinary disruptions. There is no excuse, therefore, for failing to address, if not anticipate and estimate, the effects of reestablishing this important cross-town, inter-jurisdictional commuter route. We know that at least the Jan 6, 2022, reached Mr. Zimmerman because he acknowledged receipt. Even ANC Chair Speck, no friend of our opposition to the Maret proposal, writes in the ANC's draft Resolution, that "Maret did not make adjustments ... to reflect the imminent reopening of Oregon Avenue after having been closed for several years or the National Park Service's possible continuation of pandemic-related closures of Beach Drive."

The Study fails completely to consider vital elements of the community and is not a full or accurate representation of relevant transportation issues. For example, whereas the Study discusses traffic and parking volumes, volume-capacity ratios, and vehicular Level of Service at intersections, it neither recognizes nor values the larger role transportation plays in creating community. There are no studies of current pedestrian and bicycle volumes, in a community where a great many active walkers and cyclists of all ages and abilities, who have been living under pandemic conditions for two years, take advantage of existing safe sidewalks and low-speed, low-volume neighborhood streets for transportation, recreation, and fitness, all immediately adjacent to Rock Creek Park. What will it mean for this area of hundreds of single-family homes, with many children, seniors, retirees, and adults working from home to absorb

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new traffic and parking? There is no discussion of current safety conditions, and no crash history reporting. In general terms, these are fatal flaws that should be cause for dismissing the Study's conclusions or rejecting it entirely.

DDOT has noted that transportation projects should put more emphasis on equity, sustainable transportation, and public transportation. Our neighborhood agrees, but this orientation is almost completely absent from the Wells/Maret Study.

### **Specific objections**

#### **Transportation Demand Management plan:**

In the Wells Study, the proposed Transportation Demand Management ("TDM") plan for the Maret sports complex is paper-thin. After saying (p.21) that "Typical TDM measures include incentives to use transit or other non-auto modes of transportation," it details only the use of buses for Maret teams; six bike racks; support for a Capital Bikeshare station; and admonitions to users not to block neighbors' driveways or otherwise disobey traffic laws. There are no real incentives to avoid using single occupancy vehicle trips. No shuttle buses for parents or spectators, no mention of free bikeshare membership, no Starbucks gift cards. On the other hand, the project proposes a spacious, shaded, free, off-street parking lot that will be a magnet for the kind of SOV trips that TDMs and CTRs are meant to discourage.

#### **Pedestrians:**

The study contains little discussion of pedestrian activity. What little there is understates the importance of walking and underestimates the risk of adding more traffic at peak times. This neighborhood is home to many families with young children. The past decade has seen a great turnover in home ownership as young families have moved in, eager to live here for its schools, playgrounds, and walkability, replacing an older generation of residents. The neighborhood surrounding ECC boasts a network of good sidewalks allowing for spontaneous social interaction—and they have become critical to quality social interactions.

The proposed driveway to the sports complex would be located mid-block on Nebraska. Not only would this cut across an established high-quality pedestrian route, but the driveway would also be the single entrance and exit for all cars, bicycles, pedestrians, and service vehicles. This single driveway would generate mid-block pedestrian crossings to reach parking on the south side of Nebraska. At a minimum, this crossing should be formalized as a school crossing, protected with all appropriate school crossing control devices, including crosswalk markings, school crossing signs, 15 MPH speed limit during hours of use, and possibly flashing

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beacon and crossing guard protection. This is an inherently dangerous place for concentrating activity. At certain times of the year, with the setting sun, westbound drivers on Nebraska in the afternoon can be blinded by the sun. Afternoons are expected to be the busiest peak time for activity at the proposed fields. Creating an unexpected crossing on a major collector on a sloping site requires extreme care.

#### Bicyclists:

The only bicycle data in the Study comes from Quality Counts' 2017 intersection counts. Bicyclists have scarcely been acknowledged in the Study otherwise. Yet Nebraska is used by a significant number of bicyclists heading to and from work and using Nebraska to access nearby Rock Creek Park. How many? At what times? We don't know. There is no data. Nebraska has no marked bicycle facilities, so people on bicycles share travel lanes and curbside lanes with moving traffic and parked vehicles.

DDOT has shown interest in designating bike lanes in this section of Nebraska at some point in the future. For now, they appear on a "wish list." There is no near-term answer to mixing existing and growing numbers of people on bicycles with anticipated traffic growth accompanying the proposed sports complex.

#### Pick-up and Drop-off Parking:

Maret proposes a 100-foot-long lay-by area to accommodate two full-sized buses. When not occupied by buses, the Study suggests the lay-by would be used for automobile pick-up and drop-off of field users. This would likely generate queueing, and there are no provisions for this queueing when sub-lessees would be using the facility. How will Maret monitor and enforce behavior in the public right of way?

#### Residential Traffic/Parking:

Directly across from the proposed commercial driveway to the fields are residential driveways serving 15 single-family homes. These residents typically enter Nebraska by backing into the travel lane. Many residents take advantage of curbside parking to avoid this maneuver and to have better sightlines. The combination of many existing driveways, existing curbside parking, an added commercial driveway, associated buses, and private automobile traffic accessing the field, and the reestablished Nebraska Avenue commuting corridor, on a sloping site, would combine to create 'an accident waiting to happen.'

#### Visitor Traffic /Parking:

Maret's intention to sublease the ECC fields is not treated fairly in the Study. Maret proposes a schedule of use for "youth sports organizations," but the calendar of use has been a

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moving target. There has been no honest recognition that any initial proposal would be subject to modification in the future. Maret has been clear that they plan to answer a “dearth” of playing fields in the District and anticipate high demand. All the incentives are in place for them to seek maximum use (and return on investment). A former city transportation chief suggested recently to Maret that there should be no overlap in scheduling games and asked for a minimum of one-half hour between games to facilitate changeover. Congestion between games could double the Study’s forecast traffic volumes and create additional queueing.

#### ECC:

ECC plans to reopen its therapeutic day treatment program in Fall 2022 for 20 to 25 students requiring approximately 25 faculty/staff. It also plans an after-school day care for another 25 students, with an unknown number of faculty/staff. ECC has not confirmed if there will be caps on the numbers of students and faculty. Traffic associated with student and faculty/staff trips have not been accounted for in the Study.

#### Parking lot effect on travel lanes:

The Study does not address on-street queueing to use the commercial driveway. In addition to normal through traffic, Nebraska Avenue is an emergency response route for hospitals and for Knollwood Life Plan Community, a home for seniors. This driveway could easily create additional traffic conflict points in a vital cross-city emergency route.

#### Traffic Congestion from the ECC curb cuts:

The ECC has three existing driveways in the 5800 block of Nebraska. The proposed new 24-foot-wide commercial driveway would be accompanied by the closure of one of the existing driveways, but the remaining two would continue to be actively used. With the ECC renewing operations, the potential for queueing and congestion at the Nebraska/Utah intersection is very real. The Study does not adequately address the hazards of left-hand exits from the parking lot. Enforced exits to the right, to the west, will exacerbate congestion at Nebraska/Utah.

#### Traffic congestion from additional volume:

The Study finds that increased traffic volumes at two intersections (Utah/Nebraska and Military Rd./27th St.) would cause unacceptable LOS impacts. Suggested mitigations include a slight lengthening of the signal cycle at Nebraska/Utah, and the possible reduction of curbside parking at Military/27<sup>th</sup>. Escaping notice, due to a focus on peak-hour analysis, is the overcrowding and congestion that accompany St John’s College High School game days. Any activity at the proposed Maret facilities should be timed so as not to coincide with St John’s games.

Transit:

Transit service on the M-4 bus referenced in the Study is a commuter line running only on weekdays. It would not be used by Maret students, as the school pledges to use its own buses for its own students. And it is extremely unlikely that other visitors to the field would take advantage of this transit connection. It's hard to imagine a young athlete with book bag, gym bag, and bulky sports equipment, making use of a bus service that runs – at best – only every 30 minutes. It's disingenuous for the Study to suggest that the M4 contributes anything to a TDM approach meant to lessen dependence on private motor vehicles.

Finally:

On Feb 21, ANC 3/4G released to Friends of the Field its draft resolution supporting Applicant Maret's proposal before the BZA, which it will vote on Feb 24, 2022.

As Friends of the Field has stated elsewhere, most notably in its Motion to Postpone, filed with the BZA on Feb 17, 2022, there should be no rush to proceed until deficiencies in the Wells/Maret Comprehensive Transportation Review can be competently addressed. There is plenty of time to get this right.

Respectfully,

Friends of the Field

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**\*The Washington Post reported, June 11, 2021:** "The D.C. Council passed a resolution earlier this month asking the Park Service, which controls the road, to make the change permanent, an idea backed by Mayor Muriel E. Bowser (D). District Department of Transportation Director Everett Lott said closing it to vehicles has been "a successful example of repurposing public spaces for the benefit of people.... The Park Service said that before the pandemic, traffic along the northern part of Beach Drive ranged from about 5,500 to 8,000 vehicles on weekdays.... D.C. Council member Janeese Lewis George (D-Ward 4), who voted against asking the Park Service for the permanent closure, argued that "the neighborhoods around Rock Creek Park have experienced a surge in traffic, speeding, and crashes while upper Beach Drive has been closed." <https://www.washingtonpost.com/transportation/2021/06/11/beach-drive-rock-creek-closed/>

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