

# Government of the District of Columbia

## Department of Transportation



### d. Planning and Sustainability Division

#### MEMORANDUM

**TO:** District of Columbia Board of Zoning Adjustment

**FROM:** Meredith Soniat  
Associate Director *MS*

**DATE:** November 21, 2025

**SUBJECT:** BZA Case No. 21389 – 422 3<sup>rd</sup> Street SE (Saint Peter School)

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#### APPLICATION

Saint Peter School (the “Applicant”), pursuant to Title 11 of the *District of Columbia Municipal Regulations (DCMR)*, requests Special Exceptions from the private school use requirements of Subtitle U § 203.1(m) and the penthouse setback requirements of Subtitle C § 1504.1(c) as well as an Area Variance from the penthouse height requirements of Subtitle E § 402.1 to construct a three-story addition to an existing private school building. The site is in the RF-1/CAP Zone at 422 3<sup>rd</sup> Street NE (Square 793, Lot 25) and 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, DDOT finds:

- The current student enrollment is 229 students, and the enrollment cap is 283 students. The Applicant does not propose to increase the enrollment cap;
- The Applicant expects the number of vehicle, walking, and biking trips to increase with the requested relief as the student enrollment grows closer to the enrollment cap;
- Zoning requires 27 off-street vehicle parking spaces. The Applicant is proposing to keep the five (5) existing zoning-compliant spaces and seven (7) non-compliant stacked spaces, for a total of 12 spaces;

Board of Zoning Adjustment  
District of Columbia

- The school property includes a private alley that connects the parking area just north of the playground to D Street. Parking spaces for the adjacent townhomes are also accessed from this alley;
- Per Subtitle U § 203.1(m)(1), a private school in this zone shall be located so that it does not become objectionable to nearby property because of traffic or number of students;
- The Applicant and DDOT collaborated on a Transportation Management Plan (TMP) to support non-automotive travel to and from the site and a Loading Management Plan (LMP) to support safe loading operations; and
- Given the modest increase in trips, and in conjunction with the agreed upon TMP and LMP, the impacts on the transportation network are expected to be minimal.

## RECOMMENDATION

DDOT has no objection to the approval of this application with the following condition:

- The Applicant shall implement a Transportation Management Plan and Loading Management Plan, as proposed in the Transportation Statement and included as Attachments 1 and 2, respectively.

## 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.

The Applicant is required by Zoning to provide 27 off-street parking space. The Applicant proposes to keep the five (5) existing zoning-compliant spaces and seven (7) non-compliant stacked spaces, for a total of 12 spaces. This is in line with the preferred maximum parking level of 24 spaces per DDOT's 2022 *Guidance for Comprehensive Transportation Review* based on the site's land use and distance from transit.

The vehicle parking spaces are located just north of the east playground, and the school property includes a private alley that connects this parking area north to D Street. Parking spaces for the adjacent townhouses are also accessed from this alley.

### Bicycle Parking

The project is required by Zoning to provide two (2) long- and eight (8) short-term bicycle parking spaces, since the site is only required to provide additional bicycle parking spaces for the addition's gross floor area. The Applicant is meeting these requirements by providing two (2) long-term spaces within an indoor storage room and 14 short-term bicycle parking spaces. Eight (8) of the short-term spaces will be located in public space along 3<sup>rd</sup> Street, and six (6) will be located in private space at the rear of the building near the staff entrance. While not required by Zoning, DDOT strongly encourages the Applicant to bring the site up to full zoning compliance, which would be six (6) long-term and 21 short-term bicycle parking spaces.

The Applicant should work with DDOT during public space permitting to determine a final location for the short-term bike spaces. The Applicant should refer to the most recent DDOT *Bike Parking Guide* for best practices on design of long- and short-term bicycle parking spaces.

#### 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. The Applicant proposes a Loading Management Plan, included as Attachment 2 to this report, to ensure safe and efficient loading operations on site.

Per Title 11 of the *DCMR*, Subtitle C § 901.7, additions to a historic resource must provide additional loading facilities only for the addition's gross floor area. Since the addition's gross floor area of 15,431 square feet does not meet the minimum threshold triggering loading requirements for a private school of 30,000 square feet, no loading facilities are required. Trash must be stored entirely on private property, out of the view of the sidewalk, and collected at the rear of the property.

#### **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 following public space items will need to be resolved by the Applicant during permitting:

- Coordinate with DDOT throughout the permitting process on signage and pavement markings to improve safety and facilitate the school's pick-up and drop-off operations on E Street, rather than on 3<sup>rd</sup> Street NE. This includes restriping the 400-block of 3<sup>rd</sup> Street with only a southbound parking lane with 25-feet of "daylighting" at the either end of the block (west side);
- Coordinate with DDOT and the Office of Planning (OP) during the permitting process regarding the Applicant's street tree impacts and proposed regrading of public space along 3<sup>rd</sup> Street;
- Determine final locations for the proposed short-term bicycle parking within public space. While not required by Zoning, DDOT strongly encourages the Applicant to bring the site up to full zoning compliance, which would be six (6) long-term and 21 short-term bicycle parking spaces; and
- Submit a detailed curbside management plan with proposed signage for review and approval by DDOT Curbside Management Division.

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 in this report.

## HERITAGE AND SPECIAL TREES

According to the District's [Tree Size Estimator map](#), there are two (2) Special Trees in public space along the school's E Street frontage. DDOT expects the Applicant to coordinate with the Ward 6 Arborist regarding the preservation and protection of existing Special and small street trees, as well as the planting of new street 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 DDOT's Urban Forestry Division, a Tree Protection Plan will be required.

## ATTACHMENTS

- 1) Proposed Transportation Management Plan (TMP), Wells + Associates, 8/29/25 Transportation Statement ([Exhibit 10](#))
- 2) Proposed Loading Management Plan (LMP), Wells + Associates, 8/29/25 Transportation Statement ([Exhibit 10](#))

MS:nh

## **ST. PETER SCHOOL TRANSPORTATION MANAGEMENT PLAN**

### **Overview**

To help facilitate ingress to and egress from the School and to reduce the impact of the proposed development, St. Peter School will implement a Transportation Management Plan that will consist of a Transportation Demand Management (TDM) Plan and an Operations Management Plan. Each component is summarized below:

### **Transportation Demand Management**

Traffic and parking congestion can be solved in one of two ways: 1) increase supply or 2) decrease demand. Increasing supply requires building new roads, widening existing roads, building more parking spaces, or operating additional transit service. These solutions are often infeasible in constrained urban conditions and, where feasible, can be expensive, time consuming, and in many instances, unacceptable to businesses, government agencies, and/or the general public. The demand for travel and parking can be influenced by Transportation Demand Management (TDM) plans. Typical TDM measures include incentives to use transit or other non-auto modes of transportation, bicycle and pedestrian amenities, parking management, alternative work schedules, telecommuting, and better management of existing resources. TDM plans are most effective when tailored to a specific project or user group.

### **Proposed Components of the TDM Plan**

The TDM Plan is intended to be flexible in order to respond to changes in School demographics, technology, transportation services, and various mitigation options available. Accordingly, it is envisioned that over time, new approaches in addition to those listed below will be identified and programs developed to respond to these changes. St. Peter School proposes the following strategies as part of their TDM “toolbox”:

### **General Strategies**

1. Designate a TDM coordinator who will be responsible for organizing, marketing, and accomplishing the tasks in the TDM plan and who will act as a liaison with DDOT and the community. The TDM coordinator position may be part of other duties assigned to the individual.
2. Create a transportation section on the School’s website with up-to-date information regarding all transportation options available to students, parents/guardians, and employees, including but not limited to public transportation, biking facilities and amenities (including on-site bicycle parking), and carpooling.
3. The updated TDM plan will be incorporated into the student and family handbook.

## ATTACHMENT 1

4. Fourteen bike spaces (six more than required by ZR16) will be provided. Four inverted U-racks (eight spaces) will be provided on 3<sup>rd</sup> Street near the school's entrance and three inverted U-racks (six spaces) will be provided at the rear of the building near the faculty/staff entrance.
5. Two long-term bike spaces will be provided on the first floor of the building.
6. The TDM Coordinator will demonstrate to goDCgo that the school is in compliance with the DC Commuter Benefits Law and participates in one of the three transportation benefits outlined in the law (employee-paid pre-tax benefit, employer-paid direct benefit, or shuttle service), and the Parking Cash-Out Law.

### Strategies for Students

#### *Rideshare:*

1. Register with and promote Commuter Connections School Pool Program to assist parents in finding other parents in their neighborhood to form carpools, walking groups, or biking groups.

#### *Incentives:*

1. Provide transit/alternate commute incentives to encourage students to use non-auto modes of transportation to travel to school. Incentives would include:
  - Encourage District of Columbia students/families to take advantage of the WMATA's Kids Ride Free program, which allows students who live in DC to ride free on Metrorail and Metrobus;
  - Encourage Montgomery County students/families to get a Youth Cruiser SmarTrip Card, which allows students who live in Montgomery County to ride free on all MCDOT buses and most Metrobuses within Montgomery County. Value can be added to the card for use on Metrorail, Metrobuses outside Montgomery County, and other transit systems in the area.
  - Encourage Arlington County students/families to get an iRide SmarTrip Card, which allows students who live in Arlington County to ride the ART bus and select Metrobus routes for free. Value can be added to the card for use on Metrorail and other Metrobus routes.

#### *Outreach and Education:*

1. Provide outreach and education events to stress the importance of using non-auto modes of transportation and make information more readily available. Outreach and educational events could include:
  - Hold a "Transportation to School" event at the beginning of each school year, stressing the importance of public transportation, carpooling, biking, etc.
  - Participate in DDOT's Safe Routes to School Program – The program encourages students and their parents to walk and bicycle to school by examining conditions

## ATTACHMENT 1

around schools and conducting projects and activities to improve safety and accessibility. The program also provides pedestrian and bicycle safety training in the classroom.

- Utilize resources available through goDCgo's School Services to encourage students and their parents to use sustainable transportation.
- Establish interclass and intergrade competitions and prizes for the classes that take transit, walk, and bike the most.
- Host a Walk to School/Bike to School day each year.
- Promote walking/biking in communications with parents.

### Strategies for Faculty/Staff

#### *Rideshare:*

1. Encourage carpooling by providing carpool matching assistance for faculty and staff. Assistance programs could include:
  - Support faculty/staff in identifying other faculty/staff members that live in the same area or along their commute to aid in carpooling.
  - Register with Commuter Connections and promote Commuter Connections' Ride-matching Service.

#### *Incentives:*

1. Provide transit/alternate commute incentives to encourage faculty/staff to use non-auto modes of transportation to travel to school. Incentives would include:
  - a. Allow employees to set aside \$315/month in pre-tax funds (or current amount allowed under federal law) through their paycheck for transit or vanpool expenses;
  - b. Enroll in Guaranteed Ride Home, which provides employees who regularly take transit, vanpool, carpool, walk, or bike to work with a reliable ride home when an unexpected emergency arises; and

#### *Outreach and Education:*

1. Provide training for the faculty/staff at the beginning of each academic year to implement and enforce the TDM Plan.

### Operations Management Plan

In addition to the TDM plan, St. Peter School will implement an Operations Management Plan to ensure that drop-off/pick-up procedures do not adversely impact the surrounding neighborhood. The following are the components of the plan:

## ATTACHMENT 1

Enhance the current drop-off/pick-up protocol for parents and other caregivers. The protocol will be as follows (new items are shown in **bold text**):

- Parents who drive their student(s) drop off and pick up students in the PUDO zone along E Street.
- Parent-driven vehicles are required to approach the school from the east (so that they can access the PUDO lane on the north side of E Street. Cars may NOT join the car PUDO line by making a right onto E Street from 4th Street. Parents coming from the north are required to use 6<sup>th</sup> Street to E Street.
- Double parking is prohibited, and parents in the PUDO lane must remain in their vehicles.
- Students enter through the E Street door. Arrival time is between 8:15 AM and 8:28 AM (students must be in their classroom when the 8:30 AM bell rings).
- Faculty/staff and student patrols are present on E Street during morning drop-off and afternoon pick-up.
- Student safety patrols help students into and out of the vehicles.
- Staff monitor the carpool lane and direct vehicles to move up in the line when gaps are present. **The school should increase the number of staff monitoring the carpool lane to ensure enough monitors are present for efficient operation of the PUDO lane.**
- **Staff monitoring the PUDO lane will direct parents to exit the lane if they are lingering in the PUDO lane after dropping off their child(ren).**
- Drop-off and pick-up is prohibited on 3<sup>rd</sup> Street as it is a safety hazard and blocks traffic.
- Caregivers who park in the neighborhood must drop off or pick up their child(ren) at the E Street door, except for the Pre-K and Kindergarten parents who may accompany students to their classrooms.
- At dismissal time, students who walk are dismissed through the 3<sup>rd</sup> Street door. Students who are driven are dismissed via the E Street door.
- Parents picking up child(ren) from Aftercare must enter through the E Street entrance.
- Parents are permitted to drop-off students between 8:15 and 8:28 AM. Current policy imposes a Before Care fee for students arriving before 8:15 AM. Should the school increase their enrollment to 250 or more students, the permitted drop-off window will be extended by ten minutes to distribute the student arrival over a longer time period and reduce queues in the PUDO lane.
- **Prior to the beginning of the school year, faculty and staff will receive training on PUDO operations, including an emphasis on the need to direct traffic to move into vacated spaces in the PUDO lane.**
- **Prior to the beginning of the school year, the School will send communications to parents describing the PUDO protocol. The communication also will remind parents of the following:**
  - **Parents are required to move up in the PUDO lane if a space ahead of them is vacated, unless a student is physically boarding or alighting their vehicle.**



## ATTACHMENT 1

- **Parents are obligated to pay attention in the PUDO lane and follow directions from staff managing the operations of the PUDO lane.**
- **During morning drop-off, parents are not permitted to linger in the PUDO lane before or after dropping off their child(ren).**
- **Parents are not permitted to exit their vehicles while in the PUDO lane. Staff and student safety patrols will be on-hand to assist students.**

## ATTACHMENT 2

### **ST. PETER SCHOOL LOADING MANAGEMENT PLAN**

St. Peter School will implement a loading management plan to promote safe and efficient loading operations and to minimize the impact on the surrounding neighborhood. The loading management plan will include the following:

1. The school's custodian currently serves as loading/service coordinator and will continue to serve in this capacity. The coordinator will be on duty during times when service vehicles are required to access the parking lot.
2. To the extent possible, the loading/service coordinator will schedule loading and service activities so as not to conflict with school arrival and dismissal. Some deliveries, such as parcel deliveries, may not be able to be scheduled.
3. The loading/service coordinator shall monitor inbound and outbound truck maneuvers and shall ensure that trucks accessing the service area do not block vehicular, bike, or pedestrian traffic along D Street except during those times when a truck is actively entering or exiting a loading berth.
4. Service vehicles/truck traffic interfacing with D Street traffic shall be monitored during peak periods and management measures shall be taken, if necessary, to reduce conflicts between truck and vehicular movements.
5. The loading/service coordinator will monitor the timing of deliveries to see if any adjustments need to be made to ensure any conflicts are minimized.
6. Trucks using the service area shall not be allowed to idle and shall follow all District guidelines for heavy vehicle operation, including but not limited to, DCMR 20 – Chapter 9, Section 900 (Engine Idling), the goDCgo Motorcoach Operators Guide, and the primary access routes shown on the DDOT Truck and Bus Route Map ([godcgo.com/freight](http://godcgo.com/freight)).